

# PFAS Emails for RY2020

U.S. NAVY NCTAMS LANT DET CUTLER (04626NVLCMRTE19)  
173 RIDGE RD, CUTLER, ME 04626 (Region 1)

## EPA Email – OG-1

Region 1 Email

03/07/2022 08:16am

From: *Chris Rascher*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(U.S. NAVY NCTAMS LANT DET CUTLER) (TRIFID: 04626NVLCMRTE19)] for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To                | E-Mail Address           |
|------------------------|--------------------------|
| Self: Chris Rascher    | rascher.chris@epa.gov    |
| To: LISA M. JOY        | LISA.JOY@NAVY.MIL        |
| To: CLIFFORD M. STAGGS | CLIFFORD.STAGGS@NAVY.MIL |

Attachments:

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

5 Post Office Square Suite 100 BOSTON, MA 02109

**Toxics Release Inventory (TRI) Data Quality Questions [(U.S. NAVY NCTAMS LANT DET CUTLER) (TRIFID: 04626NVLCMRTE19)] for Reporting Year(s) 2020 - Due March 29, 2022**

Mon Mar 07 13:16:05 EST 2022

Dear CLIFFORD M. STAGGS and LISA M. JOY:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The for NO\_VALUE submitted to EPA from your facility: U.S. NAVY NCTAMS LANT DET CUTLER) - (TRIFID: 04626NVLCMRTE19) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 2 hazardous waste shipments (some e-Manifest #: 2) totaling 5,837 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

*Step 1:*

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=ab0430b1-b7ef-4317-98cb-bd71f8be81ad&target=11218ba5-d510-496e-a652-743be892f2bb>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

*Step 2:*

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by March 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Chris Rascher at [rascher.chris@epa.gov](mailto:rascher.chris@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Chris Rascher

(617) 918-1834

**EPA Email – OG-2**

Region 1 Email

04/07/2022 01:17pm

From: *Chris Rascher*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To                | E-Mail Address           |
|------------------------|--------------------------|
| Self: Chris Rascher    | rascher.chris@epa.gov    |
| To: LISA M. JOY        | LISA.JOY@NAVY.MIL        |
| To: CLIFFORD M. STAGGS | CLIFFORD.STAGGS@NAVY.MIL |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Region 1

Post Office Square Suite 100 BOSTON, MA 02109

Thu Apr 07 17:17:20 UTC 2022

Dear CLIFFORD M. STAGGS and LISA M. JOY:

EPA would like to inform you that data quality issues raised for your facility [U.S. NAVY NCTAMS LANT DET CUTLER (TRIFID: 04626NVLCMRTE19)] during reporting year 2020 Adhoc Data Quality Checks are resolved for the following:

Reporting Year(s) Chemicals

2020 No chemicals

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Chris Rascher

TRI Data Quality Program

US EPA

Region 1

**Email sent on 04/07/2022 05:10pm**

## Facility Response – IC-1

U.S. NAVY NCTAMS LANT DET CUTLER - 04626NVLCMRTE19 submitted a web response on Apr 7, 2022 5:09:56 PM.  
A PDF copy of the web response is attached.

Subject: Facility Response Form

Apr 7, 2022 5:09:56 PM

From: Darrell Gyles

(120) 743-84622

darrell.f.gyles.civ@us.navy.mil

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

PFAS-NOT-F RY 2020

The source of these releases and quantities are listed below:

| Response               |   | Reporting Year<br>(if applicable) |
|------------------------|---|-----------------------------------|
| No Change              |   |                                   |
| Reason for<br>Response | PFAS amounts in hazardous waste manifests mentioned above were trace amounts (ppb/ppt), leading to PFAS totals well below 1 pound. There were manifests not mentioned, for the disposal of AFFF, which had larger amounts of PFAS. However, it was conservatively estimated that an amount of less than 30 pounds total PFAS was disposed of during 2020. |                                   |

.....

**SAFETY-KLEEN SYSTEMS INC (07036SFTYK1200S)**  
**1200 SYLVAN ST, LINDEN, NJ 07036 (Region 2)**

**EPA Email – OG-1**

Region 2 Email

03/10/2022 11:37am

From: *James Crossmon*

Subject: Response requested-TRI Data Quality questions [(SAFETY-KLEEN SYSTEMS INC) (TRIFID: 07036SFTYK1200S)] - Due April 7, 2022

| Sent To                    | E-Mail Address                  |
|----------------------------|---------------------------------|
| Self: James Crossmon       | crossmon.james@epa.gov          |
| Cc: molnar.william@epa.gov | molnar.william@epa.gov          |
| To: ANDREA MARTONE         | ANDREA.MARTONE@SAFETY-KLEEN.COM |
| To: DAVID DESHA            | DESHA.DAVID@CLEANHARBORS.COM    |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

290 Broadway NEW YORK, NY 10007

**Response requested - TRI Data Quality questions [(SAFETY-KLEEN SYSTEMS INC) (TRIFID: 07036SFTYK1200S)] -  
Due April 7, 2022**

Thu Mar 10 16:28:15 EST 2022

Dear ANDREA MARTONE and DAVID DESHA:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**SAFETY-KLEEN SYSTEMS INC - (TRIFID: 07036SFTYK1200S) has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have received approximately 12 hazardous waste shipments (some e-Manifest #s: 12) totaling 486,856 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted a report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit a new TRI report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.
- It appears your facility has received approximately 10 shipments (sub eManifest IDs) totaling 155,071 pounds of hazardous waste listed containing Dichloromethane (Methylene chloride) from several TRI facilities for reporting year 2020, but your facility does not appear to have reported for Dichloromethane (Methylene chloride) for reporting year 2020. Please review your calculations and submit a new TRI report for Dichloromethane (Methylene chloride) for reporting year 2020, if needed.
- Your facility appeared to have received approximately 18,101 pounds of COPPER or COPPER COMPOUNDS for disposal / treatment, which is over otherwise use threshold amount of 10,000 pounds from TRI facilities for reporting year 2020, but your facility did not appear to report to TRI for either COPPER or COPPER COMPOUNDS for reporting year 2020. Please review your calculations and submit a new TRI report for COPPER or COPPER COMPOUNDS for reporting year 2020, if needed.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=8c75cd2d-e9af-42ae-98cb-f394c9f666a0&target=b30b401d-9fb0-4f26-9fde-08b869683da6>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 7, 2022.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact James Crossmon at [crossmon.james@epa.gov](mailto:crossmon.james@epa.gov).

Thank you for your attention to this matter.

Sincerely,

James Crossmon

### Facility Response – IC-1

**From:** DeSha, David A <desha.david@cleanharbors.com>

**Sent:** Thursday, March 17, 2022 1:24 PM

**To:** Crossmon, James <Crossmon.James@epa.gov>

**Cc:** Molnar, William <Molnar.William@epa.gov>

**Subject:** RE: Response requested-TRI Data Quality questions [(SAFETY-KLEEN SYSTEMS INC) (TRIFID: 07036SFTYK1200S)] - Due April 7, 2022

Good day James,

Thank you for the information. We did not notice any information concerning, "... 12 hazardous waste shipments (some e-Maniest #s: 12) totaling 486,856 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm". Do you have any additional information concerning those 12 shipments such as manifest numbers?

Best regards,

*Safety Starts with Me: Live It 3-6-5*

---

David DeSha

Director Environmental Compliance

Clean Harbors Environmental Services, Inc.

**Mobile: 423.413.1218**

Email: [desha.david@cleanharbors.com](mailto:desha.david@cleanharbors.com)

Web: <https://www.cleanharbors.com/>

### EPA Email – OG-2

**From:** Crossmon, James <[Crossmon.James@epa.gov](mailto:Crossmon.James@epa.gov)>

**Sent:** Thursday, March 10, 2022 5:21 PM

**To:** DeSha, David A <[desha.david@cleanharbors.com](mailto:desha.david@cleanharbors.com)>; Martone, Andrea <[Andrea.Martone@safety-kleen.com](mailto:Andrea.Martone@safety-kleen.com)>

**Cc:** Molnar, William <[Molnar.William@epa.gov](mailto:Molnar.William@epa.gov)>

**Subject:** RE: Response requested-TRI Data Quality questions [(SAFETY-KLEEN SYSTEMS INC) (TRIFID: 07036SFTYK1200S)] - Due April 7, 2022

Yes, I'll just send you the big master files that EPA HQ had created and you can Filter and Sort to find your stuff. See attached. Thanks

### Facility Response – IC-2

**From:** DeSha, David A <[desha.david@cleanharbors.com](mailto:desha.david@cleanharbors.com)>  
**Sent:** Thursday, March 10, 2022 5:07 PM  
**To:** Crossmon, James <[Crossmon.James@epa.gov](mailto:Crossmon.James@epa.gov)>; Martone, Andrea <[Andrea.Martone@safety-kleen.com](mailto:Andrea.Martone@safety-kleen.com)>  
**Cc:** Molnar, William <[Molnar.William@epa.gov](mailto:Molnar.William@epa.gov)>  
**Subject:** RE: Response requested-TRI Data Quality questions [(SAFETY-KLEEN SYSTEMS INC) (TRIFID: 07036SFTYK1200S)] - Due April 7, 2022

Good day James,

Anyway to obtain the source of EPA's discrepancy amounts like what you previously sent to me for the 10/21/2021 Pb and Pb compounds matter?

Best regards,

***Safety Starts with Me: Live It 3-6-5***

---

David DeSha

Director Environmental Compliance  
Clean Harbors Environmental Services, Inc.

**Mobile: 423.413.1218**

Email: [desha.david@cleanharbors.com](mailto:desha.david@cleanharbors.com)

Web: [www.cleanharbors.com](http://www.cleanharbors.com)

**Facility Response – IC-3**

**From:** DeSha, David A <[desha.david@cleanharbors.com](mailto:desha.david@cleanharbors.com)>  
**Sent:** Thursday, March 17, 2022 4:03 PM  
**To:** Crossmon, James <[Crossmon.James@epa.gov](mailto:Crossmon.James@epa.gov)>  
**Cc:** Molnar, William <[Molnar.William@epa.gov](mailto:Molnar.William@epa.gov)>  
**Subject:** RE: Response requested-TRI Data Quality questions [(SAFETY-KLEEN SYSTEMS INC) (TRIFID: 07036SFTYK1200S)] - Due April 7, 2022

Thank you.

***Safety Starts with Me: Live It 3-6-5***

---

David DeSha

Director Environmental Compliance  
Clean Harbors Environmental Services, Inc.

**Mobile: 423.413.1218**

Email: [desha.david@cleanharbors.com](mailto:desha.david@cleanharbors.com)

Web: <https://www.cleanharbors.com/>

## EPA Email – OG-3

**From:** Crossmon, James <[Crossmon.James@epa.gov](mailto:Crossmon.James@epa.gov)>

**Sent:** Thursday, March 17, 2022 3:31 PM

**To:** DeSha, David A <[desha.david@cleanharbors.com](mailto:desha.david@cleanharbors.com)>

**Cc:** Molnar, William <[Molnar.William@epa.gov](mailto:Molnar.William@epa.gov)>

**Subject:** RE: Response requested-TRI Data Quality questions [(SAFETY-KLEEN SYSTEMS INC) (TRIFID: 07036SFTYK1200S)] - Due April 7, 2022

Hi David. No, I don't have any additional info other than the spreadsheets EPA HQ emailed me, the automated inquiry email they set up. If your search of the spreadsheets and your own records do not turn up the items listed in that inquiry email then there is a chance it was a data glitch on our end, in which case -nothing to see here- . You can enter your answer/findings at the link after Step 1 of the inquiry email.

Thanks for your time and attention.

## Facility Response – IC-4

**From:** DeSha, David A <[desha.david@cleanharbors.com](mailto:desha.david@cleanharbors.com)>

**Sent:** Thursday, March 17, 2022 1:24 PM

**To:** Crossmon, James <[Crossmon.James@epa.gov](mailto:Crossmon.James@epa.gov)>

**Cc:** Molnar, William <[Molnar.William@epa.gov](mailto:Molnar.William@epa.gov)>

**Subject:** RE: Response requested-TRI Data Quality questions [(SAFETY-KLEEN SYSTEMS INC) (TRIFID: 07036SFTYK1200S)] - Due April 7, 2022

Good day James,

Thank you for the information. We did not notice any information concerning, "*... 12 hazardous waste shipments (some e-Manifest #s: 12) totaling 486,856 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm*". Do you have any additional information concerning those 12 shipments such as manifest numbers?

Best regards,

***Safety Starts with Me: Live It 3-6-5***

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David DeSha

Director Environmental Compliance  
Clean Harbors Environmental Services, Inc.

**Mobile: 423.413.1218**

Email: [desha.david@cleanharbors.com](mailto:desha.david@cleanharbors.com)

Web: <https://www.cleanharbors.com/>

## EPA Email – OG-4

**From:** Crossmon, James <[Crossmon.James@epa.gov](mailto:Crossmon.James@epa.gov)>

**Sent:** Thursday, March 10, 2022 5:21 PM

**To:** DeSha, David A <[desha.david@cleanharbors.com](mailto:desha.david@cleanharbors.com)>; Martone, Andrea <[Andrea.Martone@safety-kleen.com](mailto:Andrea.Martone@safety-kleen.com)>

**Cc:** Molnar, William <[Molnar.William@epa.gov](mailto:Molnar.William@epa.gov)>

**Subject:** RE: Response requested-TRI Data Quality questions [(SAFETY-KLEEN SYSTEMS INC) (TRIFID: 07036SFTYK1200S)] - Due April 7, 2022

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David DeSha

Director Environmental Compliance  
Clean Harbors Environmental Services, Inc.

**Mobile: 423.413.1218**

Email: [desha.david@cleanharbors.com](mailto:desha.david@cleanharbors.com)

Web: [www.cleanharbors.com](http://www.cleanharbors.com)

**From:** [crossmon.james@epa.gov](mailto:crossmon.james@epa.gov) <[crossmon.james@epa.gov](mailto:crossmon.james@epa.gov)>

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**To:** DeSha, David A <[desha.david@cleanharbors.com](mailto:desha.david@cleanharbors.com)>; [crossmon.james@epa.gov](mailto:crossmon.james@epa.gov); Martone, Andrea <[Andrea.Martone@safety-kleen.com](mailto:Andrea.Martone@safety-kleen.com)>

**Cc:** [molnar.william@epa.gov](mailto:molnar.william@epa.gov)

**Subject:** Response requested-TRI Data Quality questions [(SAFETY-KLEEN SYSTEMS INC) (TRIFID: 07036SFTYK1200S)] - Due April 7, 2022

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

290 Broadway NEW YORK, NY 10007

**Response requested - TRI Data Quality questions [(SAFETY-KLEEN SYSTEMS INC) (TRIFID: 07036SFTYK1200S)] -  
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- It appears your facility has received approximately 10 shipments (sub eManifest IDs) totaling 155,071 pounds of hazardous waste listed containing Dichloromethane (Methylene chloride) from several TRI facilities for reporting year 2020, but your facility does not appear to have reported for Dichloromethane (Methylene chloride) for reporting year 2020. Please review your calculations and submit a new TRI report for Dichloromethane (Methylene chloride) for reporting year 2020, if needed.
- Your facility appeared to have received approximately 18,101 pounds of COPPER or COPPER COMPOUNDS for disposal / treatment, which is over otherwise use threshold amount of 10,000 pounds from TRI facilities for reporting year 2020, but your facility did not appear to report to TRI for either COPPER or COPPER COMPOUNDS for reporting year 2020. Please review your calculations and submit a new TRI report for COPPER or COPPER COMPOUNDS for reporting year 2020, if needed.

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reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb).  
<https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 7, 2022.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

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Thank you for your attention to this matter.

Sincerely,

James Crossmon

### Facility Response – IC-5

**From:** DeSha, David A <desha.david@cleanharbors.com>  
**Sent:** Tuesday, April 12, 2022 5:36 PM  
**To:** Crossmon, James <Crossmon.James@epa.gov>  
**Cc:** Molnar, William <Molnar.William@epa.gov>  
**Subject:** RE: Response requested-TRI Data Quality questions [(SAFETY-KLEEN SYSTEMS INC) (TRIFID: 07036SFTYK1200S)] - Due April 7, 2022

Thank you James.

*Safety Starts with Me: Live It 3-6-5*

---

David DeSha

Director Environmental Compliance  
Clean Harbors Environmental Services, Inc.

**Mobile: 423.413.1218**

Email: [desha.david@cleanharbors.com](mailto:desha.david@cleanharbors.com)

Web: <https://www.cleanharbors.com/>

### EPA Email – OG-5

**From:** Crossmon, James <[Crossmon.James@epa.gov](mailto:Crossmon.James@epa.gov)>  
**Sent:** Tuesday, April 12, 2022 5:16 PM

**To:** DeSha, David A <[desha.david@cleanharbors.com](mailto:desha.david@cleanharbors.com)>

**Cc:** Molnar, William <[Molnar.William@epa.gov](mailto:Molnar.William@epa.gov)>

**Subject:** RE: Response requested-TRI Data Quality questions [(SAFETY-KLEEN SYSTEMS INC) (TRIFID: 07036SFTYK1200S)] - Due April 7, 2022

Hi David. Yes, your questionnaire was received. Thanks

### Facility Response – IC-6

**From:** DeSha, David A <[desha.david@cleanharbors.com](mailto:desha.david@cleanharbors.com)>

**Sent:** Tuesday, April 12, 2022 5:12 PM

**To:** Crossmon, James <[Crossmon.James@epa.gov](mailto:Crossmon.James@epa.gov)>

**Cc:** Molnar, William <[Molnar.William@epa.gov](mailto:Molnar.William@epa.gov)>

**Subject:** RE: Response requested-TRI Data Quality questions [(SAFETY-KLEEN SYSTEMS INC) (TRIFID: 07036SFTYK1200S)] - Due April 7, 2022

Good afternoon James,

We responded to this matter by completing the online questionnaire but have not received any confirmation from EPA. We received other inquiries from different EPA Regions and after completing those questionnaires received an email from EPA. Can you advise if this questionnaire was received?

I want to ensure you received our response.

Best regards,

*Safety Starts with Me: Live It 3-6-5*

---

David DeSha

Director Environmental Compliance  
Clean Harbors Environmental Services, Inc.

**Mobile:** 423.413.1218

Email: [desha.david@cleanharbors.com](mailto:desha.david@cleanharbors.com)

Web: <https://www.cleanharbors.com/>

**From:** Crossmon, James <[Crossmon.James@epa.gov](mailto:Crossmon.James@epa.gov)>

**Sent:** Thursday, March 17, 2022 3:31 PM

**To:** DeSha, David A <[desha.david@cleanharbors.com](mailto:desha.david@cleanharbors.com)>

**Cc:** Molnar, William <[Molnar.William@epa.gov](mailto:Molnar.William@epa.gov)>

**Subject:** RE: Response requested-TRI Data Quality questions [(SAFETY-KLEEN SYSTEMS INC) (TRIFID: 07036SFTYK1200S)] - Due April 7, 2022

Hi David. No, I don't have any additional info other than the spreadsheets EPA HQ emailed me, the automated inquiry email they set up. If your search of the spreadsheets and your own records do not turn up the items listed in that inquiry email then there is a chance it was a data glitch on our end, in which case -nothing to see here- . You can enter your answer/findings at the link after Step 1 of the inquiry email.

Thanks for your time and attention.

**From:** DeSha, David A <[desha.david@cleanharbors.com](mailto:desha.david@cleanharbors.com)>  
**Sent:** Thursday, March 17, 2022 1:24 PM  
**To:** Crossmon, James <[Crossmon.James@epa.gov](mailto:Crossmon.James@epa.gov)>  
**Cc:** Molnar, William <[Molnar.William@epa.gov](mailto:Molnar.William@epa.gov)>  
**Subject:** RE: Response requested-TRI Data Quality questions [(SAFETY-KLEEN SYSTEMS INC) (TRIFID: 07036SFTYK1200S)] - Due April 7, 2022

Good day James,

BThank you for the information. We did not notice any information concerning, "... 12 hazardous waste shipments (some e-Manifest #: 12) totaling 486,856 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm". Do you have any additional information concerning those 12 shipments such as manifest numbers?

Best regards,

***Safety Starts with Me: Live It 3-6-5***

---

David DeSha

Director Environmental Compliance  
Clean Harbors Environmental Services, Inc.

**Mobile: 423.413.1218**

Email: [desha.david@cleanharbors.com](mailto:desha.david@cleanharbors.com)  
Web: <https://www.cleanharbors.com/>

**From:** Crossmon, James <[Crossmon.James@epa.gov](mailto:Crossmon.James@epa.gov)>  
**Sent:** Thursday, March 10, 2022 5:21 PM  
**To:** DeSha, David A <[desha.david@cleanharbors.com](mailto:desha.david@cleanharbors.com)>; Martone, Andrea <[Andrea.Martone@safety-kleen.com](mailto:Andrea.Martone@safety-kleen.com)>  
**Cc:** Molnar, William <[Molnar.William@epa.gov](mailto:Molnar.William@epa.gov)>  
**Subject:** RE: Response requested-TRI Data Quality questions [(SAFETY-KLEEN SYSTEMS INC) (TRIFID: 07036SFTYK1200S)] - Due April 7, 2022

Yes, I'll just send you the big master files that EPA HQ had created and you can Filter and Sort to find your stuff. See attached. Thanks

**From:** DeSha, David A <[desha.david@cleanharbors.com](mailto:desha.david@cleanharbors.com)>  
**Sent:** Thursday, March 10, 2022 5:07 PM  
**To:** Crossmon, James <[Crossmon.James@epa.gov](mailto:Crossmon.James@epa.gov)>; Martone, Andrea <[Andrea.Martone@safety-kleen.com](mailto:Andrea.Martone@safety-kleen.com)>  
**Cc:** Molnar, William <[Molnar.William@epa.gov](mailto:Molnar.William@epa.gov)>  
**Subject:** RE: Response requested-TRI Data Quality questions [(SAFETY-KLEEN SYSTEMS INC) (TRIFID: 07036SFTYK1200S)] - Due April 7, 2022

Good day James,

Anyway to obtain the source of EPA's discrepancy amounts like what you previously sent to me for the 10/21/2021 Pb and Pb compounds matter?

Best regards,

***Safety Starts with Me: Live It 3-6-5***

---

David DeSha

Director Environmental Compliance  
Clean Harbors Environmental Services, Inc.

**Mobile: 423.413.1218**

Email: [desha.david@cleanharbors.com](mailto:desha.david@cleanharbors.com)

Web: [www.cleanharbors.com](http://www.cleanharbors.com)

**From:** [crossmon.james@epa.gov](mailto:crossmon.james@epa.gov) <[crossmon.james@epa.gov](mailto:crossmon.james@epa.gov)>

**Sent:** Thursday, March 10, 2022 4:41 PM

**To:** DeSha, David A <[desha.david@cleanharbors.com](mailto:desha.david@cleanharbors.com)>; [crossmon.james@epa.gov](mailto:crossmon.james@epa.gov); Martone, Andrea  
<[Andrea.Martone@safety-kleen.com](mailto:Andrea.Martone@safety-kleen.com)>

**Cc:** [molnar.william@epa.gov](mailto:molnar.william@epa.gov)

**Subject:** Response requested-TRI Data Quality questions [(SAFETY-KLEEN SYSTEMS INC) (TRIFID: 07036SFTYK1200S)] - Due April 7, 2022

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

290 Broadway NEW YORK, NY 10007

**Response requested - TRI Data Quality questions [(SAFETY-KLEEN SYSTEMS INC) (TRIFID: 07036SFTYK1200S)] -  
Due April 7, 2022**

Thu Mar 10 16:28:15 EST 2022

Dear ANDREA MARTONE and DAVID DESHA:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**SAFETY-KLEEN SYSTEMS INC - (TRIFID: 07036SFTYK1200S) has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have received approximately 12 hazardous waste shipments (some e-Manifest #: 12) totaling 486,856 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted a report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit a new TRI report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

- It appears your facility has received approximately 10 shipments (sub eManifest IDs) totaling 155,071 pounds of hazardous waste listed containing Dichloromethane (Methylene chloride) from several TRI facilities for reporting year 2020, but your facility does not appear to have reported for Dichloromethane (Methylene chloride) for reporting year 2020. Please review your calculations and submit a new TRI report for Dichloromethane (Methylene chloride) for reporting year 2020, if needed.
- Your facility appeared to have received approximately 18,101 pounds of COPPER or COPPER COMPOUNDS for disposal / treatment, which is over otherwise use threshold amount of 10,000 pounds from TRI facilities for reporting year 2020, but your facility did not appear to report to TRI for either COPPER or COPPER COMPOUNDS for reporting year 2020. Please review your calculations and submit a new TRI report for COPPER or COPPER COMPOUNDS for reporting year 2020, if needed.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=8c75cd2d-e9af-42ae-98cb-f394c9f666a0&target=b30b401d-9fb0-4f26-9fde-08b869683da6>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 7, 2022.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact James Crossmon at [crossmon.james@epa.gov](mailto:crossmon.james@epa.gov).

Thank you for your attention to this matter.

Sincerely,

James Crossmon

**From:** Crossmon, James <Crossmon.James@epa.gov>

**Sent:** Thursday, March 10, 2022 5:21 PM

**To:** DeSha, David A <desha.david@cleanharbors.com>; Martone, Andrea <Andrea.Martone@safety-kleen.com>  
**Cc:** Molnar, William <Molnar.William@epa.gov>  
**Subject:** RE: Response requested-TRI Data Quality questions [(SAFETY-KLEEN SYSTEMS INC) (TRIFID: 07036SFTYK1200S)] - Due April 7, 2022

Yes, I'll just send you the big master files that EPA HQ had created and you can Filter and Sort to find your stuff.  
See attached. Thanks

**From:** DeSha, David A <[desha.david@cleanharbors.com](mailto:desha.david@cleanharbors.com)>  
**Sent:** Thursday, March 10, 2022 5:07 PM  
**To:** Crossmon, James <[Crossmon.James@epa.gov](mailto:Crossmon.James@epa.gov)>; Martone, Andrea <[Andrea.Martone@safety-kleen.com](mailto:Andrea.Martone@safety-kleen.com)>  
**Cc:** Molnar, William <[Molnar.William@epa.gov](mailto:Molnar.William@epa.gov)>  
**Subject:** RE: Response requested-TRI Data Quality questions [(SAFETY-KLEEN SYSTEMS INC) (TRIFID: 07036SFTYK1200S)] - Due April 7, 2022

Good day James,

Anyway to obtain the source of EPA's discrepancy amounts like what you previously sent to me for the 10/21/2021 Pb and Pb compounds matter?

Best regards,

*Safety Starts with Me: Live It 3-6-5*

---

David DeSha

Director Environmental Compliance  
Clean Harbors Environmental Services, Inc.

**Mobile: 423.413.1218**

Email: [desha.david@cleanharbors.com](mailto:desha.david@cleanharbors.com)  
Web: [www.cleanharbors.com](http://www.cleanharbors.com)

**From:** [crossmon.james@epa.gov](mailto:crossmon.james@epa.gov) <[crossmon.james@epa.gov](mailto:crossmon.james@epa.gov)>  
**Sent:** Thursday, March 10, 2022 4:41 PM  
**To:** DeSha, David A <[desha.david@cleanharbors.com](mailto:desha.david@cleanharbors.com)>; [crossmon.james@epa.gov](mailto:crossmon.james@epa.gov); Martone, Andrea <[Andrea.Martone@safety-kleen.com](mailto:Andrea.Martone@safety-kleen.com)>  
**Cc:** [molnar.william@epa.gov](mailto:molnar.william@epa.gov)  
**Subject:** Response requested-TRI Data Quality questions [(SAFETY-KLEEN SYSTEMS INC) (TRIFID: 07036SFTYK1200S)] - Due April 7, 2022

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

290 Broadway NEW YORK, NY 10007

**Response requested - TRI Data Quality questions [(SAFETY-KLEEN SYSTEMS INC) (TRIFID: 07036SFTYK1200S)] -  
Due April 7, 2022**

Thu Mar 10 16:28:15 EST 2022

Dear ANDREA MARTONE and DAVID DESHA:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

***SAFETY-KLEEN SYSTEMS INC - (TRIFID: 07036SFTYK1200S) has been identified for follow-up due to the following:***

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have received approximately 12 hazardous waste shipments (some e-Manifest #s: 12) totaling 486,856 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted a report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit a new TRI report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.
- It appears your facility has received approximately 10 shipments (sub eManifest IDs) totaling 155,071 pounds of hazardous waste listed containing Dichloromethane (Methylene chloride) from several TRI facilities for reporting year 2020, but your facility does not appear to have reported for Dichloromethane (Methylene chloride) for reporting year 2020. Please review your calculations and submit a new TRI report for Dichloromethane (Methylene chloride) for reporting year 2020, if needed.
- Your facility appeared to have received approximately 18,101 pounds of COPPER or COPPER COMPOUNDS for disposal / treatment, which is over otherwise use threshold amount of 10,000 pounds from TRI facilities for reporting year 2020, but your facility did not appear to report to TRI for either COPPER or COPPER COMPOUNDS for reporting year 2020. Please review your calculations and submit a new TRI report for COPPER or COPPER COMPOUNDS for reporting year 2020, if needed.

***How do I respond to this inquiry? (Step 1 is always required)***

*Step 1:*

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=8c75cd2d-e9af-42ae-98cb-f394c9f666a0&target=b30b401d-9fb0-4f26-9fde-08b869683da6>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

*Step 2:*

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI

reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb).  
<https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 7, 2022.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact James Crossmon at [crossmon.james@epa.gov](mailto:crossmon.james@epa.gov).

Thank you for your attention to this matter.

Sincerely,

James Crossmon

### Facility Response – IC-7

Subject: Facility Response Form

From: David DeSha

Apr 4, 2022 3:43:43 PM

(423) 413- desha.david@cleanharbors.com  
1218

Contractor Company Name: Clean Harbors  
Environmental Services, Inc

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

EMAN-TNO RY 2020

- It appears your facility has received approximately 10) shipments (sub eManifest IDs) totaling 155,071 pounds of hazardous waste listed containing Dichloromethane (Methylene chloride) from several TRI facilities for reporting year 2020, but your facility does not appear to have reported for Dichloromethane (Methylene chloride) for reporting year 2020. Could you please review your calculations and submit a new report for Dichloromethane (Methylene chloride) for reporting year 2020, if needed.

The source of these releases and quantities are listed below:

| Reported Chemical   | Response  | Reporting Year<br>(if applicable) |
|---------------------|---|-----------------------------------|
| Dichloromethane     | No Change   |                                   |
| Reason for Response | A review of our records indicate this chemical did not exceed the process threshold in 2020 |                                   |

OFF-TSD-MET-NON RY 2020

- Your facility appeared to have received approximately 18,101 POUNDS of COPPER or COPPER COMPOUNDS for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for either COPPER or COPPER COMPOUNDS for reporting year 2020. Please REVIEW your calculations and submit new report for COPPER or COPPER COMPOUNDS for reporting year 2020, if needed.

The source of these releases and quantities are listed below:

| Reported Chemical   | Response  | Reporting Year<br>(if applicable) |
|---------------------|---|-----------------------------------|
| Copper compounds    | No Change   |                                   |
| Reason for Response | A review of our records indicate this chemical did not exceed the process threshold in 2020 |                                   |

PFAS-NOT-F RY 2020

The source of these releases and quantities are listed below:

| Response            | Reporting Year<br>(if applicable)  |
|---------------------|--|
| No Change           |  |
| Reason for Response | A review of our records indicate these PFAS chemicals did not exceed the process threshold in 2020 |

\*\*\*\*\*

**PHILLIPS 66 CO-BAYWAY REFINERY (07036XXNXX1400P)  
1400 PARK AVE, LINDEN, NJ 07036 (Region 2)**

**EPA Email – OG-1**

Region 2 Email

03/11/2022 03:02am

From: *James Crossmon*

Subject: Response requested-TRI Data Quality questions [(PHILLIPS 66 CO-BAYWAY REFINERY) (TRIFID: 07036XXNXX1400P)] - Due April 7, 2022

| Sent To                    | E-Mail Address         |
|----------------------------|------------------------|
| Self: James Crossmon       | crossmon.james@epa.gov |
| Cc: molnar.william@epa.gov | molnar.william@epa.gov |
| To: NANCY P. SADLON        | NANCY.P.SADLON@P66.COM |
| To: SEEMA ROY              | SEEMA.ROY@P66.COM      |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

290 Broadway NEW YORK, NY 10007

**Response requested - TRI Data Quality questions [(PHILLIPS 66 CO-BAYWAY REFINERY) (TRIFID: 07036XXNXX1400P)] - Due April 7, 2022**

Fri Mar 11 07:51:40 EST 2022

Dear NANCY P. SADLON and SEEMA ROY:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**PHILLIPS 66 CO-BAYWAY REFINERY - (TRIFID: 07036XXNXX1400P) has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 1 hazardous waste shipments (some e-Manifest #: 1) totaling 6,532 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit a new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=27b3dc6b-75f0-4bd1-a5fc-33ff0eaa03e7&target=b9ab2a53-f90f-49fd-986e-ce760bfbbb02>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 7, 2022.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact James Crossmon at [crossmon.james@epa.gov](mailto:crossmon.james@epa.gov).

Thank you for your attention to this matter.

Sincerely,

James Crossmon

**EPA Email – OG-2**

Region 2 Email

04/13/2022 10:50am

From: *James Crossmon*

Subject: PHILLIPS 66 CO-BAYWAY REFINERY (TRIFID: 07036XXNXX1400P)-TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To              | E-Mail Address         |
|----------------------|------------------------|
| Self: James Crossmon | crossmon.james@epa.gov |
| To: NANCY P. SADLON  | NANCY.P.SADLON@P66.COM |
| To: SEEMA ROY        | SEEMA.ROY@P66.COM      |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Region 2

290 Broadway NEW YORK, NY 10007

Wed Apr 13 14:48:47 UTC 2022

Dear NANCY P. SADLON and SEEMA ROY:

EPA would like to inform you that data quality issues raised for your facility PHILLIPS 66 CO-BAYWAY REFINERY (TRIFID: 07036XXNXX1400P) during reporting year 2020 Ad Hoc Data Quality Checks are resolved for the following:

Reporting Year(s) Chemicals

2020 PFAS transferred off-site

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

James Crossmon

TRI Data Quality Program

US EPA

Region 2

**Email sent on 03/23/2022 01:34pm**

**Facility Response – IC-1**

Subject: Facility Response Form

From: Shereen Guirguess

Mar 23, 2022 5:33:27 PM

(908) 523-5207 shereen.a.guirguess@p66.com

Contractor Company Name: P66 Bayway Refinery

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

PFAS-NOT-F RY 2020

The source of these releases and quantities are listed below:

| Response            |  | Reporting Year<br>(if applicable) |
|---------------------|--|-----------------------------------|
| No Change           |  |                                   |
| Reason for Response | In 2020, Phillips 66 Bayway Refinery disposed 6,532 pounds of unused firefighting foam which according to the SDS, contains PFAS. This unused material was shipped offsite as waste in accordance with Solid Waste requirements. Storage and disposal of unused firefighting foam is not manufacture, process or otherwise use for the purpose of TRI reporting. In 2020, Bayway Refinery did not meet the requirements for reporting any PFAS on TRI. Therefore, the identified waste shipment was not included in the TRI for the 2020 reporting year. |                                   |
| *****               |  |                                   |

**DUPONT SPECIALTY PRODUCTS USA LLC - CHAMBERS  
WORKS (08023DPNTCRT130)  
RT 130, DEEPWATER, NJ 08023**

**EPA Email – OG-1**

Region 2 Email

08/05/2021 05:09am

From: *James Crossmon*

Subject: DUPONT SPECIALTY PRODUCTS USA LLC - CHAMBERS WORKS (TRIFID: 08023DPNTCRT130) - Action  
Requested by 8/31/2021 - US EPA TRI Data Quality questions

| Sent To                    | E-Mail Address                |
|----------------------------|-------------------------------|
| Self: James Crossmon       | crossmon.james@epa.gov        |
| Cc: molnar.william@epa.gov | molnar.william@epa.gov        |
| To: STEPHEN HASTINGS       | STEPHEN.R.HASTINGS@DUPONT.COM |
| To: STEPHEN HASTINGS       | STEPHEN.R.HASTINGS@DUPONT.COM |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

290 Broadway NEW YORK, NY 10007

**Toxics Release Inventory (TRI) Data Quality Questions [(DUPONT SPECIALTY PRODUCTS USA LLC - CHAMBERS  
WORKS) (TRIFID: 08023DPNTCRT130)] Form R for Reporting Year(s) 2020 - Due August 31, 2021**

Thu Aug 05 08:42:31 EDT 2021

Dear STEPHEN HASTINGS:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**Reporting year 2020 has been identified for follow-up due to the following:**

Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ( [https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf) ) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Comparing what your facility may have reported to Toxic Substances Control Act (TSCA) Chemical Data Reporting (CDR) to your facility's TRI reporting, the following observations suggest further review:

- Your facility has not submitted a report for Poly(difluoromethylene),  $\alpha$ -fluoro- $\omega$ -[2-[(2-methyl-1-oxo-2-propenyl)oxy]ethyl]- to TRI for reporting year 2020, but might have reported this chemical, Poly(difluoromethylene),  $\alpha$ -fluoro- $\omega$ -[2-[(2-methyl-1-oxo-2-propenyl)oxy]ethyl]- to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for Ethanol, 2,2'-iminobis-, compd. with  $\alpha,\alpha'$ -[phosphinicobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoropoly(difluoromethylene)] (1:1) to TRI for reporting year 2020, but might have reported this chemical, Ethanol, 2,2'-iminobis-, compd. with  $\alpha,\alpha'$ -[phosphinicobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoropoly(difluoromethylene)] (1:1) to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for Decane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8-heptadecafluoro-10-iodo- to TRI for reporting year 2020, but might have reported this chemical, Decane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8-heptadecafluoro-10-iodo- to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for 1,1,2,2-Tetrahydroperfluorodecyl acrylate to TRI for reporting year 2020, but might have reported this chemical, 1,1,2,2-Tetrahydroperfluorodecyl acrylate to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for 1-Decanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluoro- to TRI for reporting year 2020, but might have reported this chemical, 1-Decanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluoro- to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for Poly(difluoromethylene),  $\alpha,\alpha'$ -[phosphinicobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoro-, ammonium salt to TRI for reporting year 2020, but might have reported this chemical, Poly(difluoromethylene),  $\alpha,\alpha'$ -[phosphinicobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoro-, ammonium salt to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for 1-Tetradecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,14-pentacosafuoro- to TRI for reporting year 2020, but might have reported this chemical, 1-Tetradecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,14-pentacosafuoro- to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for Hexadecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14-nonacosafuoro-16-iodo- to TRI for reporting year 2020, but might have reported this chemical, Hexadecane,

1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14-nonacosafuoro-16-iodo- to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.

- Your facility has not submitted a report for 1,1,2,2-Tetrahydroperfluorododecyl acrylate to TRI for reporting year 2020, but might have reported this chemical, 1,1,2,2-Tetrahydroperfluorododecyl acrylate to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required..
- Your facility has not submitted a report for Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (2:1) to TRI for reporting year 2020, but might have reported this chemical, Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (2:1) to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for 1,1,2,2-Tetrahydroperfluorohexadecyl acrylate to TRI for reporting year 2020, but might have reported this chemical, 1,1,2,2-Tetrahydroperfluorohexadecyl acrylate to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for 1-Dodecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafuoro- to TRI for reporting year 2020, but might have reported this chemical, 1-Dodecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafuoro- to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for 1,1,2,2-Tetrahydroperfluorotetradecyl acrylate to TRI for reporting year 2020, but might have reported this chemical, 1,1,2,2-Tetrahydroperfluorotetradecyl acrylate to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for Dodecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10-heneicosafuoro-12-iodo- to TRI for reporting year 2020, but might have reported this chemical, Dodecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10-heneicosafuoro-12-iodo- to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for 1-Hexadecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,15,15,16,16,16-nonacosafuoro- to TRI for reporting year 2020, but might have reported this chemical, 1-Hexadecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,15,15,16,16,16-nonacosafuoro- to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for Tetradecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12-pentacosafuoro-14-iodo- to TRI for reporting year 2020, but might have reported this chemical, Tetradecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12-pentacosafuoro-14-iodo- to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=71d81ed2-8f77-40f2-8a96-69c32e36b592&target=f474a673-48b7-433a-95e0-bbc61d10b787>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by August 31, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact James Crossmon at [crossmon.james@epa.gov](mailto:crossmon.james@epa.gov).

Thank you for your attention to this matter.

Sincerely,

James Crossmon

**EPA Email – OG-2**

Region 2 Email

08/24/2021 01:46pm

From: *James Crossmon*

Subject: DUPONT SPECIALTY PRODUCTS USA LLC - CHAMBERS WORKS (TRIFID: 08023DPNTCRT130) -TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To                    | E-Mail Address                |
|----------------------------|-------------------------------|
| Self: James Crossmon       | crossmon.james@epa.gov        |
| Cc: molnar.william@epa.gov | molnar.william@epa.gov        |
| To: STEPHEN HASTINGS       | STEPHEN.R.HASTINGS@DUPONT.COM |
| To: STEPHEN HASTINGS       | STEPHEN.R.HASTINGS@DUPONT.COM |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Region 2

290 Broadway NEW YORK, NY 10007

Tue Aug 24 17:43:14 EDT 2021

Dear STEPHEN HASTINGS:

EPA would like to inform you that data quality issues raised for your facility DUPONT SPECIALTY PRODUCTS USA LLC - CHAMBERS WORKS (TRIFID: 08023DPNTRC130) during reporting year 2020 Data Quality Checks cycle are resolved for the following:

Reporting Year(s) Chemicals

2020 1,1,2,2-Tetrahydroperfluorodecyl acrylate, 1,1,2,2-Tetrahydroperfluorododecyl acrylate, 1,1,2,2-Tetrahydroperfluorohexadecyl acrylate, 1,1,2,2-Tetrahydroperfluorotetradecyl acrylate, 1-Decanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluoro-, 1-Dodecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafluoro-, 1-Hexadecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,15,15,16,16,16-nonacosafuoro-, 1-Tetradecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,14-pentacosafuoro-, Decane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8-heptadecafluoro-10-iodo-, Dodecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10-heneicosafluoro-12-iodo-, Ethanol, 2,2'-iminobis-, compd. with  $\alpha,\alpha'$ -[phosphinicobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoropoly(difluoromethylene)] (1:1), Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (2:1), Hexadecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14-nonacosafuoro-16-iodo-, Poly(difluoromethylene),  $\alpha,\alpha'$ -[phosphinicobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoro-, ammonium salt, Poly(difluoromethylene),  $\alpha$ -fluoro- $\omega$ -[2-[(2-methyl-1-oxo-2-propenyl)oxy]ethyl]- and Tetradecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12-pentacosafuoro-14-iodo-

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

James Crossmon

TRI Data Quality Program

US EPA

Region 2

Email sent on 08/05/2021 09:09am

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

290 Broadway NEW YORK, NY 10007

**Toxics Release Inventory (TRI) Data Quality Questions [(DUPONT SPECIALTY PRODUCTS USA LLC - CHAMBERS WORKS) (TRIFID: 08023DPNTRT130)] Form R for Reporting Year(s) 2020 - Due August 31, 2021**

Thu Aug 05 08:42:31 EDT 2021

Dear STEPHEN HASTINGS:

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**Reporting year 2020 has been identified for follow-up due to the following:**

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- Your facility has not submitted a report for Decane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8-heptafluoro-10-iodo- to TRI for reporting year 2020, but might have reported this chemical, Decane,

1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8-heptadecafluoro-10-iodo- to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.

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- Your facility has not submitted a report for 1-Tetradecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,14-pentacosafuoro- to TRI for reporting year 2020, but might have reported this chemical, 1-Tetradecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,14-pentacosafuoro- to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for Hexadecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14-nonacosafuoro-16-iodo- to TRI for reporting year 2020, but might have reported this chemical, Hexadecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14-nonacosafuoro-16-iodo- to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
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- Your facility has not submitted a report for Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (2:1) to TRI for reporting year 2020, but might have reported this chemical, Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (2:1) to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for 1,1,2,2-Tetrahydroperfluorohexadecyl acrylate to TRI for reporting year 2020, but might have reported this chemical, 1,1,2,2-Tetrahydroperfluorohexadecyl acrylate to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.

- Your facility has not submitted a report for 1-Dodecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafuoro- to TRI for reporting year 2020, but might have reported this chemical, 1-Dodecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafuoro- to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for 1,1,2,2-Tetrahydroperfluorotetradecyl acrylate to TRI for reporting year 2020, but might have reported this chemical, 1,1,2,2-Tetrahydroperfluorotetradecyl acrylate to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for Dodecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10-heneicosafuoro-12-iodo- to TRI for reporting year 2020, but might have reported this chemical, Dodecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10-heneicosafuoro-12-iodo- to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for 1-Hexadecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,15,15,16,16,16-nonacosafuoro- to TRI for reporting year 2020, but might have reported this chemical, 1-Hexadecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,15,15,16,16,16-nonacosafuoro- to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for Tetradecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-pentacosafuoro-14-iodo- to TRI for reporting year 2020, but might have reported this chemical, Tetradecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-pentacosafuoro-14-iodo- to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=71d81ed2-8f77-40f2-8a96-69c32e36b592&target=f474a673-48b7-433a-95e0-bbc61d10b787>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-

MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by August 31, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact James Crossmon at [crossmon.james@epa.gov](mailto:crossmon.james@epa.gov).

Thank you for your attention to this matter.

Sincerely,

James Crossmon

### Facility Response – IC-1

**From:** Crossmon, James

**Sent:** Wednesday, August 11, 2021 3:08 PM

**To:** CASSIDY, JAMES P. <[James.P.Cassidy@dupont.com](mailto:James.P.Cassidy@dupont.com)>

**Subject:** RE: [EXTERNAL] DUPONT SPECIALTY PRODUCTS USA LLC - CHAMBERS WORKS (TRIFID: 08023DPNCTCRT130) - Action Requested by 8/31/2021 - US EPA TRI Data Quality questions

You don't need to do anything else on this. After the call with you, I spoke with EPA Headquarters and they relabeled the potential CDR reporting thing as Chemours, and I will reach out to Chemours and see if it is even a valid issue for them. But I don't anticipate you needing to do anything on this moving forward.

Thanks for your call earlier.

**From:** CASSIDY, JAMES P. <[James.P.Cassidy@dupont.com](mailto:James.P.Cassidy@dupont.com)>

**Sent:** Wednesday, August 11, 2021 1:02 PM

**To:** Crossmon, James <[Crossmon.James@epa.gov](mailto:Crossmon.James@epa.gov)>

**Subject:** FW: [EXTERNAL] DUPONT SPECIALTY PRODUCTS USA LLC - CHAMBERS WORKS (TRIFID: 08023DPNCTCRT130) - Action Requested by 8/31/2021 - US EPA TRI Data Quality questions

James:

It was a pleasure talking to you this afternoon. Just to follow up on our discussion, I'll sit tight on this request while you check with headquarters. If you don't mind, I'll follow up with you towards the end of August just so I don't miss the response deadline.

If you need anything else from us, please let me know.

Regards,

**Jim Cassidy, CSP**

Environmental, Health, and Safety Manager

DuPont Chambers Works

Electronics & Industrial



Office Number: +1-856-276-9170

Cell Phone Number: +1-856-628-3327

US Rte 130

Deepwater, NJ 08023

[www.dupont.com](http://www.dupont.com)

**From:** Hastings, Stephen R

**Sent:** Friday, August 06, 2021 9:56 AM

**To:** CASSIDY, JAMES P. <[James.P.Cassidy@dupont.com](mailto:James.P.Cassidy@dupont.com)>

**Subject:** FW: [EXTERNAL] DUPONT SPECIALTY PRODUCTS USA LLC - CHAMBERS WORKS (TRIFID: 08023DPNTCRT130) - Action Requested by 8/31/2021 - US EPA TRI Data Quality questions

FYI

**From:** [crossmon.james@epa.gov](mailto:crossmon.james@epa.gov) <[crossmon.james@epa.gov](mailto:crossmon.james@epa.gov)>

**Sent:** Thursday, August 5, 2021 9:11 AM

**To:** [crossmon.james@epa.gov](mailto:crossmon.james@epa.gov); Hastings, Stephen R <[Stephen.R.Hastings@dupont.com](mailto:Stephen.R.Hastings@dupont.com)>

**Cc:** [molnar.william@epa.gov](mailto:molnar.william@epa.gov)

**Subject:** [EXTERNAL] DUPONT SPECIALTY PRODUCTS USA LLC - CHAMBERS WORKS (TRIFID: 08023DPNTCRT130) - Action Requested by 8/31/2021 - US EPA TRI Data Quality questions

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

290 Broadway NEW YORK, NY 10007

**Toxics Release Inventory (TRI) Data Quality Questions [(DUPONT SPECIALTY PRODUCTS USA LLC - CHAMBERS WORKS) (TRIFID: 08023DPNTCRT130)] Form R for Reporting Year(s) 2020 - Due August 31, 2021**

Thu Aug 05 08:42:31 EDT 2021

Dear STEPHEN HASTINGS:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**Reporting year 2020 has been identified for follow-up due to the following:**

Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ( [https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf) ) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Comparing what your facility may have reported to Toxic Substances Control Act (TSCA) Chemical Data Reporting (CDR) to your facility's TRI reporting, the following observations suggest further review:

- Your facility has not submitted a report for Poly(difluoromethylene),  $\alpha$ -fluoro- $\omega$ -[2-[(2-methyl-1-oxo-2-propenyl)oxy]ethyl]- to TRI for reporting year 2020, but might have reported this chemical, Poly(difluoromethylene),  $\alpha$ -fluoro- $\omega$ -[2-[(2-methyl-1-oxo-2-propenyl)oxy]ethyl]- to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for Ethanol, 2,2'-iminobis-, compd. with  $\alpha,\alpha'$ -[phosphinicobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoropoly(difluoromethylene)] (1:1) to TRI for reporting year 2020, but might have reported this chemical, Ethanol, 2,2'-iminobis-, compd. with  $\alpha,\alpha'$ -[phosphinicobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoropoly(difluoromethylene)] (1:1) to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for Decane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8-heptadecafluoro-10-iodo- to TRI for reporting year 2020, but might have reported this chemical, Decane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8-heptadecafluoro-10-iodo- to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for 1,1,2,2-Tetrahydroperfluorodecyl acrylate to TRI for reporting year 2020, but might have reported this chemical, 1,1,2,2-Tetrahydroperfluorodecyl acrylate to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for 1-Decanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluoro- to TRI for reporting year 2020, but might have reported this chemical, 1-Decanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluoro- to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for Poly(difluoromethylene),  $\alpha,\alpha'$ -[phosphinicobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoro-, ammonium salt to TRI for reporting year 2020, but might have reported this chemical, Poly(difluoromethylene),  $\alpha,\alpha'$ -[phosphinicobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoro-, ammonium salt to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for 1-Tetradecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,14-pentacosafuoro- to TRI for reporting year 2020, but might have reported this chemical, 1-Tetradecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,14-pentacosafuoro- to 2016 CDR as

manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.

- Your facility has not submitted a report for Hexadecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14-nonacosafuoro-16-iodo- to TRI for reporting year 2020, but might have reported this chemical, Hexadecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14-nonacosafuoro-16-iodo- to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for 1,1,2,2-Tetrahydroperfluorododecyl acrylate to TRI for reporting year 2020, but might have reported this chemical, 1,1,2,2-Tetrahydroperfluorododecyl acrylate to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required..
- Your facility has not submitted a report for Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (2:1) to TRI for reporting year 2020, but might have reported this chemical, Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (2:1) to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for 1,1,2,2-Tetrahydroperfluorohexadecyl acrylate to TRI for reporting year 2020, but might have reported this chemical, 1,1,2,2-Tetrahydroperfluorohexadecyl acrylate to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for 1-Dodecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafuoro- to TRI for reporting year 2020, but might have reported this chemical, 1-Dodecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafuoro- to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for 1,1,2,2-Tetrahydroperfluorotetradecyl acrylate to TRI for reporting year 2020, but might have reported this chemical, 1,1,2,2-Tetrahydroperfluorotetradecyl acrylate to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for Dodecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10-heneicosafuoro-12-iodo- to TRI for reporting year 2020, but might have reported this chemical, Dodecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10-heneicosafuoro-12-iodo- to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for 1-Hexadecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,15,15,16,16-nonacosafuoro- to TRI for reporting year 2020, but might have reported this chemical, 1-Hexadecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,15,15,16,16-nonacosafuoro- to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.

- Your facility has not submitted a report for Tetradecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12-pentacosafuoro-14-iodo- to TRI for reporting year 2020, but might have reported this chemical, Tetradecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12-pentacosafuoro-14-iodo- to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=71d81ed2-8f77-40f2-8a96-69c32e36b592&target=f474a673-48b7-433a-95e0-bbc61d10b787>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by August 31, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact James Crossmon at [crossmon.james@epa.gov](mailto:crossmon.james@epa.gov).

Thank you for your attention to this matter.

Sincerely,

James Crossmon

**Facility Response – IC-2**

Velu Senthil updated the Error Status from "Unresolved" to "Resolved" with Facility Response Code "DCR - Data is correct as reported." for Error Code PFAS-NOT, reporting year 2020, and chemical 1-Tetradecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,14-pentacosafuoro-. Velu Senthil updated the Error Status from "Unresolved" to "Resolved" with Facility Response Code "DCR - Data is correct as reported." for Error Code PFAS-NOT, reporting year 2020, and chemical 1,1,2,2-Tetrahydroperfluorodecyl acrylate. Velu Senthil updated the Error Status from "Unresolved" to "Resolved" with Facility Response Code "DCR - Data is correct as reported." for Error Code PFAS-NOT, reporting year 2020, and chemical 1,1,2,2-Tetrahydroperfluorododecyl acrylate. Velu Senthil updated the Error Status from "Unresolved" to "Resolved" with Facility Response Code "DCR - Data is correct as reported." for Error Code PFAS-NOT, reporting year 2020, and chemical 1-Decanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluoro-. Velu Senthil updated the Error Status from "Unresolved" to "Resolved" with Facility Response Code "DCR - Data is correct as reported." for Error Code PFAS-NOT, reporting year 2020, and chemical Ethanol, 2,2'-iminobis-, compd. with  $\alpha,\alpha'$ -[phosphinicobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoropoly(difluoromethylene)] (1:1). Velu Senthil updated the Error Status from "Unresolved" to "Resolved" with Facility Response Code "DCR - Data is correct as reported." for Error Code PFAS-NOT, reporting year 2020, and chemical Tetradecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12-pentacosafuoro-14-iodo-. Velu Senthil updated the Error Status from "Unresolved" to "Resolved" with Facility Response Code "DCR - Data is correct as reported." for Error Code PFAS-NOT, reporting year 2020, and chemical Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (2:1). Velu Senthil updated the Error Status from "Unresolved" to "Resolved" with Facility Response Code "DCR - Data is correct as reported." for Error Code PFAS-NOT, reporting year 2020, and chemical Poly(difluoromethylene),  $\alpha,\alpha'$ -[phosphinicobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoro-, ammonium salt. Velu Senthil updated the Error Status from "Unresolved" to "Resolved" with Facility Response Code "DCR - Data is correct as reported." for Error Code PFAS-NOT, reporting year 2020, and chemical 1,1,2,2-Tetrahydroperfluorohexadecyl acrylate. Velu Senthil updated the Error Status from "Unresolved" to "Resolved" with Facility Response Code "DCR - Data is correct as reported." for Error Code PFAS-NOT, reporting year 2020, and chemical 1,1,2,2-Tetrahydroperfluorotetradecyl acrylate. Velu Senthil updated the Error Status from "Unresolved" to "Resolved" with Facility Response Code "DCR - Data is correct as reported." for Error Code PFAS-NOT, reporting year 2020, and chemical Hexadecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14-nonacosafuoro-16-iodo-. Velu Senthil updated the Error Status from "Unresolved" to "Resolved" with Facility Response Code "DCR - Data is correct as reported." for Error Code PFAS-NOT, reporting year 2020, and chemical 1-Dodecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafuoro-. Velu Senthil updated the Error Status from "Unresolved" to "Resolved" with Facility Response Code "DCR - Data is correct as reported." for Error Code PFAS-NOT, reporting year 2020, and chemical Dodecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10-heneicosafuoro-12-iodo-. Velu Senthil updated the Error Status from "Unresolved" to "Resolved" with Facility Response Code "DCR - Data is correct as reported." for Error Code PFAS-NOT, reporting year 2020, and chemical Decane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8-heptadecafluoro-10-iodo-. Velu Senthil updated the Error Status from "Unresolved" to "Resolved" with Facility Response Code "DCR - Data is correct as reported." for Error Code PFAS-NOT, reporting year 2020, and chemical 1-Hexadecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,15,15,16,16,16-nonacosafuoro-. Velu Senthil updated the Error Status from "Unresolved" to "Resolved" with Facility Response Code "DCR - Data is correct as reported." for Error Code PFAS-NOT, reporting year 2020, and chemical Poly(difluoromethylene),  $\alpha$ -fluoro- $\omega$ -[2-[(2-methyl-1-oxo-2-propenyl)oxy]ethyl]-.

There might be a glitch in TRIFIDs matching.



# CHEMOURS CHAMBERS WORKS (0802WCHMRS67CAN) 67 CANAL ROAD, DEEPWATER, NJ 08023 (Region 2)

## EPA Email – OG-1

Region 2 Email

08/13/2021 05:42am

From: *James Crossmon*

Subject: CHEMOURS CHAMBERS WORKS (TRIFID: 0802WCHMRS67CAN) - Action Requested by 8/31/2021 - US EPA TRI Data Quality questions

| Sent To                    | E-Mail Address               |
|----------------------------|------------------------------|
| Self: James Crossmon       | crossmon.james@epa.gov       |
| Cc: molnar.william@epa.gov | molnar.william@epa.gov       |
| To: SCOTT NORTHEY          | SCOTT.T.NORTHEY@CHEMOURS.COM |
| To: SCOTT NORTHEY          | SCOTT.T.NORTHEY@CHEMOURS.COM |

Attachments:

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

290 Broadway NEW YORK, NY 10007

### Toxics Release Inventory (TRI) Data Quality Questions CHEMOURS CHAMBERS WORKS (TRIFID: 0802WCHMRS67CAN) Form R for Reporting Year(s) 2020 - Due August 31, 2021

Fri Aug 13 09:33:21 EDT 2021

Dear SCOTT NORTHEY:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

### Reporting year 2020 has been identified for follow-up due to the following:

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manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.

- Your facility has not submitted a report for Ethanol, 2,2'-iminobis-, compd. with  $\alpha,\alpha'$ -[phosphinicobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoropoly(difluoromethylene)] (1:1) to TRI for reporting year 2020, but might have reported this chemical, Ethanol, 2,2'-iminobis-, compd. with  $\alpha,\alpha'$ -[phosphinicobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoropoly(difluoromethylene)] (1:1) to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
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- Your facility has not submitted a report for 1,1,2,2-Tetrahydroperfluorodecyl acrylate to TRI for reporting year 2020, but might have reported this chemical, 1,1,2,2-Tetrahydroperfluorodecyl acrylate to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for 1-Decanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluoro- to TRI for reporting year 2020, but might have reported this chemical, 1-Decanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluoro- to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for Poly(difluoromethylene),  $\alpha,\alpha'$ -[phosphinicobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoro-, ammonium salt to TRI for reporting year 2020, but might have reported this chemical, Poly(difluoromethylene),  $\alpha,\alpha'$ -[phosphinicobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoro-, ammonium salt to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for 1-Tetradecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,14-pentacosafuoro- to TRI for reporting year 2020, but might have reported this chemical, 1-Tetradecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,14-pentacosafuoro- to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
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- Your facility has not submitted a report for Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (2:1) to TRI for reporting year 2020, but might have reported

this chemical, Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonoxy)ethyl]poly(difluoromethylene) (2:1) to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.

- Your facility has not submitted a report for 1,1,2,2-Tetrahydroperfluorohexadecyl acrylate to TRI for reporting year 2020, but might have reported this chemical, 1,1,2,2-Tetrahydroperfluorohexadecyl acrylate to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for 1-Dodecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafuoro- to TRI for reporting year 2020, but might have reported this chemical, 1-Dodecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafuoro- to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for 1,1,2,2-Tetrahydroperfluorotetradecyl acrylate to TRI for reporting year 2020, but might have reported this chemical, 1,1,2,2-Tetrahydroperfluorotetradecyl acrylate to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for Dodecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10-heneicosafuoro-12-iodo- to TRI for reporting year 2020, but might have reported this chemical, Dodecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10-heneicosafuoro-12-iodo- to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for 1-Hexadecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,15,15,16,16,16-nonacosafuoro- to TRI for reporting year 2020, but might have reported this chemical, 1-Hexadecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,15,15,16,16,16-nonacosafuoro- to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.
- Your facility has not submitted a report for Tetradecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12-pentacosafuoro-14-iodo- to TRI for reporting year 2020, but might have reported this chemical, Tetradecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12-pentacosafuoro-14-iodo- to 2016 CDR as manufactured / imported. Please review your records and submit a new report to TRI for this chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=880f3209-97cf-4c60-98e1-da974f934ff2&target=78ab5354-5306-41f1-a30a-41fdc8fbc5fb>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

Step 2:

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by August 31, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact James Crossmon at [crossmon.james@epa.gov](mailto:crossmon.james@epa.gov).

Thank you for your attention to this matter.

Sincerely,

James Crossmon

## EPA Email – OG-2

Region 2 Email

08/17/2021 06:29am

From: *James Crossmon*

Subject: Mr. Northey, try this survey link - Data Quality Questions -CHEMOURS CHAMBERS WORKS- TRIFID: 0802WCHMRS67CAN-Form R for Reporting Year 2020

| Sent To  | E-Mail Address   |
|--|--|
| Self: James Crossmon   | <a href="mailto:crossmon.james@epa.gov">crossmon.james@epa.gov</a>             |
| Cc: <a href="mailto:molnar.william@epa.gov">molnar.william@epa.gov</a> | <a href="mailto:molnar.william@epa.gov">molnar.william@epa.gov</a>             |
| To: SCOTT NORTHEY  | <a href="mailto:SCOTT.T.NORTHEY@CHEMOURS.COM">SCOTT.T.NORTHEY@CHEMOURS.COM</a> |
| To: SCOTT NORTHEY  | <a href="mailto:SCOTT.T.NORTHEY@CHEMOURS.COM">SCOTT.T.NORTHEY@CHEMOURS.COM</a> |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

290 Broadway NEW YORK, NY 10007

**Toxics Release Inventory (TRI) Data Quality Questions [(CHEMOURS CHAMBERS WORKS) (TRIFID: 0802WCHMRS67CAN)] Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Tue Aug 17 10:23:53 EDT 2021

Dear SCOTT NORTHEY:

As per our emails back and forth on 8/17/2021 in which you stated the questionnaire link did not work correctly for you, here is another attempt to if I can get the link to translate correctly as it goes out of our EPA system to you. Let me know. If it still fails then I will reach out to my EPA Headquarters contacts for further guidance. Thanks

Begin by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=3902d68e-3274-4018-a4a2-76eac3accd2e&target=78ab5354-5306-41f1-a30a-41fdc8fbc5fb>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

*Step 2:*

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by September 10, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact James Crossmon at [crossmon.james@epa.gov](mailto:crossmon.james@epa.gov).

Thank you for your attention to this matter.

Sincerely,

James Crossmon

**EPA Email – OG-3**

Region 2 Email  
08/24/2021 01:34pm  
From: *James Crossmon*

Subject: CHEMOURS CHAMBERS WORKS (TRIFID: 0802WCHMRS67CAN) - TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To                    | E-Mail Address               |
|----------------------------|------------------------------|
| Self: James Crossmon       | crossmon.james@epa.gov       |
| Cc: molnar.william@epa.gov | molnar.william@epa.gov       |
| To: SCOTT NORTHEY          | SCOTT.T.NORTHEY@CHEMOURS.COM |
| To: SCOTT NORTHEY          | SCOTT.T.NORTHEY@CHEMOURS.COM |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Region 2

290 Broadway NEW YORK, NY 10007

Tue Aug 24 17:31:32 EDT 2021

Dear SCOTT NORTHEY:

EPA would like to inform you that data quality issues raised for your facility CHEMOURS CHAMBERS WORKS (TRIFID: 0802WCHMRS67CAN) during reporting year 2019 and 2020 Data Quality Checks cycle are resolved for the following:

Reporting Year(s) Chemicals

2019 Dibromotetrafluoroethane 2020 1,1,2,2-Tetrahydroperfluorodecyl acrylate, 1,1,2,2-Tetrahydroperfluorododecyl acrylate, 1,1,2,2-Tetrahydroperfluorohexadecyl acrylate, 1,1,2,2-Tetrahydroperfluorotetradecyl acrylate, 1-Decanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluoro-, 1-Dodecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafuoro-, 1-Hexadecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,15,15,16,16-nonacosafuoro-, 1-Tetradecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,14-pentacosafuoro-, Decane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8-heptadecafluoro-10-iodo-, Dodecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10-heneicosafuoro-12-iodo-, Ethanol, 2,2'-iminobis-, compd. with  $\alpha,\alpha'$ -[phosphinicobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoropoly(difluoromethylene)] (1:1), Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (2:1), Hexadecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14-nonacosafuoro-16-iodo-, Poly(difluoromethylene),  $\alpha,\alpha'$ -[phosphinicobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoro-, ammonium salt, Poly(difluoromethylene),  $\alpha$ -fluoro- $\omega$ -[2-[(2-methyl-1-oxo-2-propenyl)oxy]ethyl]- and Tetradecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12-pentacosafuoro-14-iodo-

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

James Crossmon

TRI Data Quality Program

US EPA

Region 2

Email sent on 08/23/2021 09:19am

CHEMOURS CHAMBERS WORKS - 0802WCHMRS67CAN submitted a web response on Aug 23, 2021 9:18:30 AM. A PDF copy of the web response is attached.

### Facility Response – IC-1

Subject: Facility Response Form

Aug 23, 2021 9:18:30 AM

From: Scott Northey

(856) 540-2012

scott.t.northey@chemours.com

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

#### PFAS-NOT RY 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for 1,1,2,2-Tetrahydroperfluorodecyl acrylate to TRI for reporting year 2020, but might have reported this chemical, 1,1,2,2-Tetrahydroperfluorodecyl acrylate to 2016 CDR as manufactured / imported. Please review and submit new report for 1,1,2,2-Tetrahydroperfluorodecyl acrylate for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for 1,1,2,2-Tetrahydroperfluorododecyl acrylate to TRI for reporting year 2020, but might have reported this chemical, 1,1,2,2-Tetrahydroperfluorododecyl acrylate to 2016 CDR as manufactured / imported. Please review and submit new report for 1,1,2,2-Tetrahydroperfluorododecyl acrylate for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for 1,1,2,2-Tetrahydroperfluorohexadecyl acrylate to TRI for reporting year 2020, but might have reported this chemical, 1,1,2,2-Tetrahydroperfluorohexadecyl acrylate to 2016 CDR as manufactured / imported. Please review and submit new report for 1,1,2,2-Tetrahydroperfluorohexadecyl acrylate for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for

1,1,2,2-Tetrahydroperfluorotetradecyl acrylate to TRI for reporting year 2020, but might have reported this chemical, 1,1,2,2-Tetrahydroperfluorotetradecyl acrylate to 2016 CDR as manufactured / imported. Please review and submit new report for 1,1,2,2-Tetrahydroperfluorotetradecyl acrylate for reporting year 2020, if required.

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for 1-Decanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluoro- to TRI for reporting year 2020, but might have reported this chemical, 1-Decanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluoro- to 2016 CDR as manufactured / imported. Please review and submit new report for 1-Decanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluoro- for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for 1-Dodecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafuoro- to TRI for reporting year 2020, but might have reported this chemical, 1-Dodecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafuoro- to 2016 CDR as manufactured / imported. Please review and submit new report for 1-Dodecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafuoro- for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for 1-Hexadecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,15,15,16,16,16-nonacosafuoro- to TRI for reporting year 2020, but might have reported this chemical, 1-Hexadecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,15,15,16,16,16-nonacosafuoro- to 2016 CDR as manufactured / imported. Please review and submit new report for 1-Hexadecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,15,15,16,16,16-nonacosafuoro- for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for 1-Tetradecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,14-pentacosafuoro- to TRI for reporting year 2020, but might have reported this chemical, 1-Tetradecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,14-pentacosafuoro- to 2016 CDR as manufactured / imported. Please review and submit new report for 1-Tetradecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,14-pentacosafuoro- for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Decane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8-heptadecafluoro-10-iodo- to TRI for reporting year 2020, but might have reported this chemical, Decane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8-heptadecafluoro-10-iodo- to 2016 CDR

as manufactured / imported. Please review and submit new report for Decane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8-heptadecafluoro-10-iodo- for reporting year 2020, if required.

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Dodecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10-heneicosafluoro-12-iodo- to TRI for reporting year 2020, but might have reported this chemical, Dodecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10-heneicosafluoro-12-iodo- to 2016 CDR as manufactured / imported. Please review and submit new report for Dodecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10-heneicosafluoro-12-iodo- for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Ethanol, 2,2'-iminobis-, compd. with  $\alpha,\alpha'$ -[phosphinobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoropoly(difluoromethylene)] (1:1) to TRI for reporting year 2020, but might have reported this chemical, Ethanol, 2,2'-iminobis-, compd. with  $\alpha,\alpha'$ -[phosphinobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoropoly(difluoromethylene)] (1:1) to 2016 CDR as manufactured / imported. Please review and submit new report for Ethanol, 2,2'-iminobis-, compd. with  $\alpha,\alpha'$ -[phosphinobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoropoly(difluoromethylene)] (1:1) for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonoxy)ethyl]poly(difluoromethylene) (2:1) to TRI for reporting year 2020, but might have reported this chemical, Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonoxy)ethyl]poly(difluoromethylene) (2:1) to 2016 CDR as manufactured / imported. Please review and submit new report for Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonoxy)ethyl]poly(difluoromethylene) (2:1) for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Hexadecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14-nonacosafuoro-16-iodo- to TRI for reporting year 2020, but might have reported this chemical, Hexadecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14-nonacosafuoro-16-iodo- to 2016 CDR as manufactured / imported. Please review and submit new report for Hexadecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14-nonacosafuoro-16-iodo- for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Poly(difluoromethylene),  $\alpha,\alpha'$ -[phosphinobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoro-, ammonium salt to TRI for reporting year 2020, but might have reported this chemical, Poly(difluoromethylene),  $\alpha,\alpha'$ -[phosphinobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoro-, ammonium salt to 2016 CDR as manufactured /

imported. Please review and submit new report for Poly(difluoromethylene),  $\alpha,\alpha'$ -[phosphinicobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoro-, ammonium salt for reporting year 2020, if required.

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Poly(difluoromethylene),  $\alpha$ -fluoro- $\omega$ -[2-[(2-methyl-1-oxo-2-propenyl)oxy]ethyl]- to TRI for reporting year 2020, but might have reported this chemical, Poly(difluoromethylene),  $\alpha$ -fluoro- $\omega$ -[2-[(2-methyl-1-oxo-2-propenyl)oxy]ethyl]- to 2016 CDR as manufactured / imported. Please review and submit new report for Poly(difluoromethylene),  $\alpha$ -fluoro- $\omega$ -[2-[(2-methyl-1-oxo-2-propenyl)oxy]ethyl]- for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Tetradecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12-pentacosafuoro-14-iodo- to TRI for reporting year 2020, but might have reported this chemical, Tetradecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12-pentacosafuoro-14-iodo- to 2016 CDR as manufactured / imported. Please review and submit new report for Tetradecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12-pentacosafuoro-14-iodo- for reporting year 2020, if required.

The source of these releases and quantities are listed below:

| Reported Chemical  | Reporting Year (if Response applicable) |
|--|---|
| 1,1,2,2-Tetrahydroperfluorodecyl acrylate                                      | No Change                               |
| Reason for Response  | Below 100 pound threshold               |
| 1,1,2,2-Tetrahydroperfluorododecyl acrylate                                    | No Change                               |
| Reason for Response  | No longer manufactured on site          |
| 1,1,2,2-Tetrahydroperfluorohexadecyl acrylate                                  | No Change                               |
| Reason for Response  | No longer manufactured on site          |
| 1,1,2,2-Tetrahydroperfluorotetradecyl acrylate                                 | No Change                               |
| Reason for Response  | No longer manufactured on site          |
| 1-Decanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluoro-               | No Change                               |
| Reason for Response  | Below 100 pound threshold               |
| 1-Dodecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafluoro- | No Change                               |

| Reported Chemical  | Reporting Year<br>(if Response applicable) |
|--|--|
| Reason for Response  | No longer manufactured on site             |
| 1-Hexadecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,15,15,16,16,16-nonacosafuoro-   | No Change                                  |
| Reason for Response  | No longer manufactured on site             |
| 1-Tetradecanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,14-pentacosafuoro-   | No Change                                  |
| Reason for Response  | No longer manufactured on site             |
| Decane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8-heptadecafluoro-10-iodo-   | No Change                                  |
| Reason for Response  | Below 100 pound threshold                  |
| Dodecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10-heneicosafuoro-12-iodo-  | No Change                                  |
| Reason for Response  | No longer manufactured on site             |
| Ethanol, 2,2'-iminobis-, compd. with $\alpha,\alpha'$ -[phosphinicobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoropoly(difluoromethylene)] (1:1) | No Change                                  |
| Reason for Response  | No longer manufactured on site             |
| Ethanol, 2,2'-iminobis-, compd. with $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (2:1)                          | No Change                                  |
| Reason for Response  | No longer manufactured on site             |
| Hexadecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14-nonacosafuoro-16-iodo-   | No Change                                  |
| Reason for Response  | No longer manufactured on site             |
| Poly(difluoromethylene), $\alpha,\alpha'$ -[phosphinicobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoro-, ammonium salt                           | No Change                                  |
| Reason for Response  | No longer manufactured on site             |
| Poly(difluoromethylene), $\alpha$ -fluoro- $\omega$ -[2-[(2-methyl-1-oxo-2-propenyl)oxy]ethyl]-  | No Change                                  |
| Reason for Response  | No longer manufactured on site             |
| Tetradecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12-pentacosafuoro-14-iodo-   | No Change                                  |
| Reason for Response  | No longer manufactured on site             |

# INTERNATIONAL FLAVORS & FRAGRANCES INC (08810NTRNT150DO)

150 DOCKS CORNER RD, DAYTON, NJ 08810 (Region 2)

## EPA Email – OG-1

Region 2 Email

03/10/2022 11:14am

From: *James Crossmon*

Subject: Response requested-TRI Data Quality questions [(INTERNATIONAL FLAVORS & FRAGRANCES INC) (TRIFID: 08810NTRNT150DO)] - Due April 7, 2022

| Sent To                    | E-Mail Address         |
|----------------------------|------------------------|
| Self: James Crossmon       | crossmon.james@epa.gov |
| Cc: molnar.william@epa.gov | molnar.william@epa.gov |
| To: RONALD SENNA           | NA                     |

Attachments:

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

290 Broadway NEW YORK, NY 10007

**Response requested - TRI Data Quality questions [(INTERNATIONAL FLAVORS & FRAGRANCES INC) (TRIFID: 08810NTRNT150DO)] - Due April 7, 2022**

Thu Mar 10 16:12:33 EST 2022

Dear RONALD SENNA:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**INTERNATIONAL FLAVORS & FRAGRANCES INC - (TRIFID: 08810NTRNT150DO) has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 1 hazardous waste shipments (some e-Manifest #: 1) totaling 30,349 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit a new TRI report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=a3803f38-23bc-4762-8285-54819b4e1111&target=b4252504-a84e-4dd4-8222-a6a6cd1a6e5d>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 7, 2022.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact James Crossmon at [crossmon.james@epa.gov](mailto:crossmon.james@epa.gov).

Thank you for your attention to this matter.

Sincerely,

James Crossmon

**From:** Crossmon, James <[Crossmon.James@epa.gov](mailto:Crossmon.James@epa.gov)>

**Sent:** Thursday, April 21, 2022 5:01 PM

**To:** Molnar, William <Molnar.William@epa.gov>  
**Subject:** RE: Document1

Yes, I will close it out. Thanks

**From:** Molnar, William <[Molnar.William@epa.gov](mailto:Molnar.William@epa.gov)>  
**Sent:** Thursday, April 21, 2022 4:52 PM  
**To:** Crossmon, James <[Crossmon.James@epa.gov](mailto:Crossmon.James@epa.gov)>  
**Subject:** FW: Document1

James –

Received this email from Steven Sontag (International Flavors & Fragrances) a short while ago. Is this information sufficient to close the TRI-Quest DQ issue?

Bill

### **EPA Email – OG-2**

**From:** Molnar, William <[Molnar.William@epa.gov](mailto:Molnar.William@epa.gov)>  
**Sent:** Wednesday, April 13, 2022 2:38 PM  
**To:** Steven Sontag <[Steven.Sontag@IFF.com](mailto:Steven.Sontag@IFF.com)>  
**Cc:** Crossmon, James <[Crossmon.James@epa.gov](mailto:Crossmon.James@epa.gov)>  
**Subject:** Document1

Mr. Sontag –

As requested, attached is a copy of the email that was sent to Ronald Senna by Mr. James Crossmon on March 10, 2020. Please review and respond as directed (Step 1 **always required** and Step 2 **if necessary**).

Thanks,

William Molnar,

Toxics Program Specialist

Assisting the EPA under a Cooperative Agreement

with The Center for Workforce Inclusion

Pesticides and Toxic Substances Compliance Branch

2890 Woodbridge Ave. (MS-225)

Edison, N.J. 08837-3679

Phone: (732) 321-6629

Fax: (732) 321-6788

e-mail: [molnar.william@epa.gov](mailto:molnar.william@epa.gov)

### **Facility Response – IC-1**

**From:** Steven Sontag <[Steven.Sontag@IFF.com](mailto:Steven.Sontag@IFF.com)>  
**Sent:** Thursday, April 21, 2022 3:58 PM  
**To:** Molnar, William <[Molnar.William@epa.gov](mailto:Molnar.William@epa.gov)>  
**Cc:** Joseph Thomas <[Joseph.Thomas@IFF.com](mailto:Joseph.Thomas@IFF.com)>; Thomas Sofield Jr. <[thomas.sofield@iff.com](mailto:thomas.sofield@iff.com)>  
**Subject:** FW: Document1

Restricted

Mr. Molnar, International Flavors and Fragrances (IFF) is in receipt of your E Mail dated 4-13-2022 referencing a letter sent to a Ron Senna of IFF on 3-10-2020 concerning the disposal of AR-AFFF and subsequent TRI non-reporting. The disposal amount of PFAS stated in the letter is 30,349 pounds with a TRI threshold of 100 pounds.

Upon request for additional information by IFF, Mr. Molnar provided the Uniform Hazardous Waste Manifest (#014861437 FLE; line 11) which lists 12 containers of AR-AFFF with a combined weight of 60 pounds being disposed. Based on three SDS' for AR-AFFF the maximum PFAS concentration is 5-7% with a specific gravity of 1.03. Based on this information the quantity of PFAS disposed of is calculated as follows:

$(60 \text{ gallons} \times (8.54 \text{ lbs/gallon} \times 1.03)) = 528 \text{ pounds} \times 7\% \text{ PFAS } (0.07) = 36.96 \text{ pounds of PFAS.}$

The approximately 37 pounds of PFAS contained in the material disposed of is below the 100 pound TRI reporting threshold for PFAS.

The 30,349 pound number identified in the EPA letter is the total weight of material disposed on the manifest provided by EPA.

IFF respectfully requests that the EPA close this matter.

Should you have any additional questions or comments, I can be reached at 609-664-7038 or at [steven.sontag@iff.com](mailto:steven.sontag@iff.com).

Regards,

**Steven Sontag**

**International Flavors & Fragrances Inc.**

**Environmental Facility Services Engineer**

**150 Docks Corner Rd**

**South Brunswick, NJ 08810**

**[Steven.Sontag@iff.com](mailto:Steven.Sontag@iff.com)**

**1-609-664-7038**

**EPA Email – OG-3**

**From:** Molnar, William <[Molnar.William@epa.gov](mailto:Molnar.William@epa.gov)>  
**Sent:** Thursday, April 21, 2022 4:52 PM

**To:** Crossmon, James <[Crossmon.James@epa.gov](mailto:Crossmon.James@epa.gov)>  
**Subject:** FW: Document1

James –

Received this email from Steven Sontag (International Flavors & Fragrances) a short while ago. Is this information sufficient to close the TRI-Quest DQ issue?

Bill

#### **EPA Email – OG-4**

**From:** Crossmon, James <[Crossmon.James@epa.gov](mailto:Crossmon.James@epa.gov)>  
**Sent:** Thursday, April 21, 2022 5:01 PM  
**To:** Molnar, William <[Molnar.William@epa.gov](mailto:Molnar.William@epa.gov)>  
**Subject:** RE: Document1

Yes, I will close it out. Thanks

#### **Facility Response – IC-2**

Status Update

04/22/2022

*James Crossmon*

James Crossmon updated the Error Status from "Unresolved" to "Resolved" with Facility Response Code "BRT - Below chemical activity (manufacturing, processing, otherwise use) reporting threshold." for Error Code PFAS-NOT-F and reporting year 2020. In email communications with the facility they stated: "... the Uniform Hazardous Waste Manifest (#014861437 FLE; line 11) which lists 12 containers of AR-AFFF with a combined weight of 60 pounds being disposed. Based on three SDS' for AR-AFFF the maximum PFAS concentration is 5-7% with a specific gravity of 1.03. Based on this information the quantity of PFAS disposed of is calculated as follows: (60 gallons x (8.54lbs/gallon x 1.03)) = 528 pounds x 7% PFAS (0.07) = 36.96 pounds of PFAS. The approximately 37 pounds of PFAS contained in the material disposed of is below the 100 pound TRI reporting threshold for PFAS. The 30,349 pound number identified in the EPA letter is the total weight of material disposed on the manifest provided by EPA. IFF respectfully requests that the EPA close this matter. Should you have any additional questions or comments, I can be reached at 609-664-7038 or at [steven.sontag@iff.com](mailto:steven.sontag@iff.com). "

\*\*\*\*\*

**NORLITE LLC (12047NRLTC628SO)**  
**628 S SARATOGA ST, COHOES, NY 12047 (Region 2)**

**EPA Email – OG-1**

Region 2 Email

04/07/2022 02:44pm

From: *James Crossmon*

Subject: Response requested - NORLITE LLC (TRIFID 12047NRLTC628SO) TRI Data Quality Questions - Due April 22, 2022

| Sent To                    | E-Mail Address            |
|----------------------------|---------------------------|
| Self: James Crossmon       | crossmon.james@epa.gov    |
| Cc: molnar.william@epa.gov | molnar.william@epa.gov    |
| To: TITA LAGRIMAS          | TITA.LAGRIMAS@TRADEBE.COM |
| To: PRINCE KNIGHT III      | PRINCE.KNIGHT@TRADEBE.COM |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

290 Broadway NEW YORK, NY 10007

**Toxics Release Inventory (TRI) Data Quality Questions NORLITE LLC (TRIFID: 12047NRLTC628SO) Form R for Reporting Year(s) 2020 - Due April 22, 2022**

Thu Apr 07 18:34:53 UTC 2022

Dear TITA LAGRIMAS and PRINCE KNIGHT III:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**Your facility: NORLITE LLC - (TRIFID 12047NRLTC628SO) has been identified for follow-up due to the following:**

Reporting Year 2020

- It appears your facility has received approximately 62 shipments (sub eManifest IDs) totaling 2,220,169 pounds of hazardous waste listed containing Chromium Compounds from several TRI facilities for reporting year 2020, but your facility does not appear to have reported for Chromium Compounds for reporting year 2020. Please review your calculations and submit a new report for Chromium Compounds for reporting year 2020, if needed.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=a469cd7e-2508-495f-956d-4ba4194144d3&target=29ce71cd-a175-40b5-9556-4e26d6548948>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 22, 2022.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact James Crossmon at [crossmon.james@epa.gov](mailto:crossmon.james@epa.gov).

Thank you for your attention to this matter.

Sincerely,

James Crossmon

**Facility Response IC-1**

Subject: Facility Response Form  
From: Prince Knight  
Contractor Company Name: Norlite, LLC

Apr 25, 2022 8:05:05 PM  
(518) 235-0401 [Prince.Knight@Tradebe.com](mailto:Prince.Knight@Tradebe.com)

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

EMAN-TNO RY 2020

- It appears your facility has received approximately 62) shipments (sub eManifest IDs) totaling 2,220,169 pounds of hazardous waste listed containing Chromium / Chromium compounds from several TRI facilities for reporting year 2020, but your facility does not appear to have reported for Chromium / Chromium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Chromium / Chromium compounds for reporting year 2020, if needed.

The source of these releases and quantities are listed below:

| Reported Chemical  | Response   | Reporting Year<br>(if applicable) |
|--|--|-----------------------------------|
| Chromium compounds (except for chromite ore mined in the Transvaal Region) | Other  |                                   |
| Reason for Response  | Norlite will revise the 2020 TRI report once the profile for the generator of these shipments has been corrected. Norlite quantities of TRI chemicals received is based on the profiled material into our facility. At this point, the waste profile for the material for these deliveries did not contain Chromium, therefore we cannot yet calculate the additional amount received. Norlite did report 1149 lbs of Chromium/Chromium materials from other generators. |                                   |

\*\*\*\*\*

**YORK CASKET CO (17402YRKCS2880B)**  
**2880 BLACKBRIDGE RD, YORK, PA 17402 (Region 3)**

**EPA Email – OG-1**

Region 3 Email

07/27/2021 07:10am

From: *Timothy Travers*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(YORK CASKET CO) (TRIFID: 17402YRKCS2880B)] for RY 2020 - Due September 10, 2021

| Sent To                  | E-Mail Address            |
|--------------------------|---------------------------|
| Self: Timothy Travers    | travers.timothy@epa.gov   |
| Cc: senthil.velu@epa.gov | senthil.velu@epa.gov      |
| To: YURIJ WOWCZUK        | YWOWCZUK@MATTHEWSINTL.COM |
| To: YURIJ WOWCZUK        | YWOWCZUK@MATTHEWSINTL.COM |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1650 Arch Street PHILADELPHIA, PA 19103

**Toxics Release Inventory (TRI) Data Quality Questions [(YORK CASKET CO) (TRIFID: 17402YRKCS2880B)] Form R  
for Reporting Year(s) 2020 - Due September 10, 2021**

Tue Jul 27 11:09:54 EDT 2021

Dear YURIJ WOWCZUK:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Perfluorooctane sulfonic acid submitted to EPA from your facility [(Name: YORK CASKET CO) - (TRIFID: 17402YRKCS2880B)] for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Perfluorooctane sulfonic acid to TRI for reporting year 2020, but might have received Perfluorooctane sulfonic acid in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment, and also might have reported

this chemical, Perfluorooctane sulfonic acid to 2020 CDR as manufactured / imported. Please review and submit new report for Perfluorooctane sulfonic acid for reporting year 2020, if required.

***How do I respond to this inquiry?***

***Step 1:***

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=7fee6d5a-26d3-4b41-9df1-4023c5edc670&target=97e7784b-d3a6-4d83-9d1a-df3c06477fad>

***If you indicate new submission, revision or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you would like to make any revisions, withdrawals or new submissions, **please send them to EPA by September 10, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have any follow up questions, please contact Timothy Travers at (215) 814-3465 or email at [travers.timothy@epa.gov](mailto:travers.timothy@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Timothy Travers

1650 Arch Street PHILADELPHIA, PA 19103

**EPA Email – OG-2**

Region 3 Email

08/18/2021 08:19am

From: *Camille Lukey*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(YORK CASKET CO) (TRIFID: 17402YRKCS2880B)]  
Form R for Reporting Year(s) 2020 - Due September 10, 2021

| Sent To             | E-Mail Address            |
|---------------------|---------------------------|
| Self: Camille Lukey | lukey.camille@epa.gov     |
| To: YURIJ WOWCZUK   | YWOWCZUK@MATTHEWSINTL.COM |
| To: YURIJ WOWCZUK   | YWOWCZUK@MATTHEWSINTL.COM |

Attachments:

**Questions for Your Facility [(YORK CASKET CO) (TRIFID: 17402YRKCS2880B)] Regarding Toxics Release Inventory (TRI) Submissions - Due September 10, 2021**

Dear YURIJ WOWCZUK:

This email is an reminder to EPA email(s) dated July 25, 2021 about data quality questions for your facility for reporting year(s) 2020. EPA has NOT received your web response yet. ***Please send your web response ASAP.***

**How do I respond to this inquiry?**

**Step 1:**

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=d058c3c2-aff7-40d4-9139-9224d8c03ba3&target=97e7784b-d3a6-4d83-9d1a-df3c06477fad>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

**Step 2:**

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by September 10, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Camille Lukey at [lukey.camille@epa.gov](mailto:lukey.camille@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Camille Lukeyl

1650 Arch Street PHILADELPHIA, PA 19103

**Email sent on 07/27/2021 11:10am**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1650 Arch Street PHILADELPHIA, PA 19103

**Toxics Release Inventory (TRI) Data Quality Questions [(YORK CASKET CO) (TRIFID: 17402YRKCS2880B)] Form R  
for Reporting Year(s) 2020 - Due September 10, 2021**

Tue Jul 27 11:09:54 EDT 2021

Dear YURIJ WOWCZUK:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Perfluorooctane sulfonic acid submitted to EPA from your facility [(Name: YORK CASKET CO) - (TRIFID: 17402YRKCS2880B)] for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Perfluorooctane sulfonic acid to TRI for reporting year 2020, but might have received Perfluorooctane sulfonic acid in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment, and also might have reported this chemical, Perfluorooctane sulfonic acid to 2020 CDR as manufactured / imported. Please review and submit new report for Perfluorooctane sulfonic acid for reporting year 2020, if required.

***How do I respond to this inquiry?***

*Step 1:*

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=7fee6d5a-26d3-4b41-9df1-4023c5edc670&target=97e7784b-d3a6-4d83-9d1a-df3c06477fad>

***If you indicate new submission, revision or withdrawal in web response questionnaire, please proceed to step 2.***

*Step 2:*

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you would like to make any revisions, withdrawals or new submissions, **please send them to EPA by September 10, 2021.**

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If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have any follow up questions, please contact Timothy Travers at (215) 814-3465 or email at [travers.timothy@epa.gov](mailto:travers.timothy@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Timothy Travers

1650 Arch Street PHILADELPHIA, PA 19103

### **EPA Email – OG-3**

Region 3 Email

09/03/2021 03:40am

From: *Camille Lukey*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To             | E-Mail Address   |
|---------------------|--|
| Self: Camille Lukey | <a href="mailto:lukey.camille@epa.gov">lukey.camille@epa.gov</a>         |
| To: YURIJ WOWCZUK   | <a href="mailto:YWOWCZUK@MATTHEWSINTL.COM">YWOWCZUK@MATTHEWSINTL.COM</a> |
| To: YURIJ WOWCZUK   | <a href="mailto:YWOWCZUK@MATTHEWSINTL.COM">YWOWCZUK@MATTHEWSINTL.COM</a> |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Region 3

1650 Arch Street PHILADELPHIA, PA 19103

Fri Sep 03 07:39:59 EDT 2021

Dear YURIJ WOWCZUK:

EPA would like to inform you that data quality issues raised for your facility [YORK CASKET CO (TRIFID: 17402YRKCS2880B)] during reporting year 2020 Adhoc Data Quality Checks cycle are resolved for the following:

Reporting Year(s) Chemicals

2020 Perfluorooctane sulfonic acid

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Camille Lukey

TRI Data Quality Program

US EPA

Region 3

**Email sent on 08/18/2021 12:19pm**

**Questions for Your Facility [(YORK CASKET CO) (TRIFID: 17402YRKCS2880B)] Regarding Toxics Release Inventory (TRI) Submissions - Due September 10, 2021**

Dear YURIJ WOWCZUK:

This email is a reminder to EPA email(s) dated July 25, 2021 about data quality questions for your facility for reporting year(s) 2020. EPA has NOT received your web response yet. ***Please send your web response ASAP.***

**How do I respond to this inquiry?**

**Step 1:**

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=d058c3c2-aff7-40d4-9139-9224d8c03ba3&target=97e7784b-d3a6-4d83-9d1a-df3c06477fad>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

Step 2:

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If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by September 10, 2021.**

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Thank you for your attention to this matter.

Sincerely,

Camille Lukeyl

1650 Arch Street PHILADELPHIA, PA 19103

**Email sent on 07/27/2021 11:10am**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1650 Arch Street PHILADELPHIA, PA 19103

**Toxics Release Inventory (TRI) Data Quality Questions [(YORK CASKET CO) (TRIFID: 17402YRKCS2880B)] Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Tue Jul 27 11:09:54 EDT 2021

Dear YURIJ WOWCZUK:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Perfluorooctane sulfonic acid submitted to EPA from your facility [(Name: YORK CASKET CO) - (TRIFID: 17402YRKCS2880B)] for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Perfluorooctane sulfonic acid to TRI for reporting year 2020, but might have received Perfluorooctane sulfonic acid in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment, and also might have reported this chemical, Perfluorooctane sulfonic acid to 2020 CDR as manufactured / imported. Please review and submit new report for Perfluorooctane sulfonic acid for reporting year 2020, if required.

***How do I respond to this inquiry?***

*Step 1:*

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=7fee6d5a-26d3-4b41-9df1-4023c5edc670&target=97e7784b-d3a6-4d83-9d1a-df3c06477fad>

***If you indicate new submission, revision or withdrawal in web response questionnaire, please proceed to step 2.***

*Step 2:*

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you would like to make any revisions, withdrawals or new submissions, **please send them to EPA by September 10, 2021.**

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Thank you for your attention to this matter.

Sincerely,

Timothy Travers

1650 Arch Street PHILADELPHIA, PA 19103

### Facility Response IC-1

Subject: Facility Response Form

Aug 20, 2021 12:10:10 PM

From: Yuriy Wowczuk

(412) 442-8279

ywowczuk@matw.com

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

PFAS-NOT RY 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Perfluorooctane sulfonic acid to TRI for reporting year 2020, but might have received Perfluorooctane sulfonic acid in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment, and also might have reported this chemical, Perfluorooctane sulfonic acid to 2020 CDR as manufactured / imported. Please review and submit new report for Perfluorooctane sulfonic acid for reporting year 2020, if required.

The source of these releases and quantities are listed below:

| Reported Chemical             | Response  | Reporting Year<br>(if applicable) |
|-------------------------------|---|-----------------------------------|
| Perfluorooctane sulfonic acid | No Change   |                                   |
| Reason for Response           | York Casket Company is a wooden casket manufacturing facility and has reviewed the chemical composition information for all materials used and processed at the facility during the 2020 reporting year for the presence of polyfluoroalkyl substances including perfluorooctane sulfonic acid and related compounds and determined that these polyfluoroalkyl substances are not present in any materials used or processed. Reporting for polyfluoroalkyl substances for the 2020 reporting year is not required. |                                   |

\*\*\*\*\*

REPUBLIC ENVIRONMENTAL SYSTEMS PENNSYLVANIA  
LLC (19440RPBLC2869S)  
2869 SANDSTONE DR, HATFIELD, PA 19440 (Region 3)

**EPA Email – OG-1**

Region 3 Email

03/08/2022 11:03am

From: *Timothy Travers*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(REPUBLIC ENVIRONMENTAL SYSTEMS PENNSYLVANIA LLC) (TRIFID: 19440RPBLC2869S)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To                   | E-Mail Address              |
|---------------------------|-----------------------------|
| Self: Timothy Travers     | travers.timothy@epa.gov     |
| Cc: senthil.velu@epa.gov  | senthil.velu@epa.gov        |
| Cc: lukey.camille@epa.gov | lukey.camille@epa.gov       |
| To: RICH SCHEULE          | RICH.SCHEULE@STERICYCLE.COM |
| To: EDWARD BURK           | ED.BURK@STERICYCLE.COM      |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1650 Arch Street PHILADELPHIA, PA 19103

**Toxics Release Inventory (TRI) Data Quality Questions [(REPUBLIC ENVIRONMENTAL SYSTEMS PENNSYLVANIA LLC) (TRIFID: 19440RPBLC2869S)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 08 16:03:09 EST 2022

Dear RICH SCHEULE and EDWARD BURK:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: *REPUBLIC ENVIRONMENTAL SYSTEMS PENNSYLVANIA LLC* - (TRIFID: 19440RPBLC2869S) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to

the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have received approximately 5 hazardous waste shipments (some e-Manifest #s: 5) totaling 61,000 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=04b4f7b8-9101-4a11-83ae-2d8552533506&target=b7462261-0602-4fae-aa76-60ccabd92601>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

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If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Timothy Travers at [travers.timothy@epa.gov](mailto:travers.timothy@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Timothy Travers

\*\*\*\*\*

**U.S. MARINE CORPS CHERRY POINT AIR  
STATION (28533SDDSMNCHWY)  
NC HWY 101 AT US 70 W, CHERRY POINT, NC 28533 (Region 4)**

**EPA Email – OG-1**

Region 4 Email

03/15/2022 07:51am

From: *Ezequiel Velez*

Subject: Toxics Release Inventory (TRI) Data Quality Questions - Due April 15, 2022

| Sent To            | E-Mail Address          |
|--------------------|-------------------------|
| To: CRYSTAL SMITH  | CRYSTAL.SMITH1@USMC.MIL |
| To: RICHARD WEAVER | RICHARD.WEAVER@USMC.MIL |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Toxics Release Inventory (TRI) Data Quality Questions [(U.S. MARINE CORPS CHERRY POINT AIR STATION)  
(TRIFID: 28533SDDSMNCHWY)] Form R for Reporting Year(s) 2020 - Due April 15, 2022**

Tue Mar 15 11:51:13 EDT 2022

Dear CRYSTAL SMITH and RICHARD WEAVER:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Cadmium compounds, Chromium compounds (except for chromite ore mined in the Transvaal Region) and Lead compounds submitted to EPA from your facility: U.S. MARINE CORPS CHERRY POINT AIR STATION) - (TRIFID: 28533SDDSMNCHWY) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- It appears your facility has sent approximately 155) shipments (sub eManifest IDs) totaling 196,284 pounds of hazardous waste listed containing Cadmium / Cadmium compounds to offsite location(s) for

reporting year 2020, but your facility does not appear to have reported for Cadmium / Cadmium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Cadmium / Cadmium compounds for reporting year 2020, if needed.

- It appears your facility has sent approximately 78) shipments (sub eManifest IDs) totaling 131,719 pounds of hazardous waste listed containing Lead / Lead compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Lead / Lead compounds for reporting year 2020. Could you please review your calculations and submit a new report for Lead / Lead compounds for reporting year 2020, if needed.
- It appears your facility has sent approximately 143) shipments (sub eManifest IDs) totaling 158,460 pounds of hazardous waste listed containing Chromium / Chromium compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Chromium / Chromium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Chromium / Chromium compounds for reporting year 2020, if needed.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 6 hazardous waste shipments (some e-Manifest #: 6) totaling 176,888 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimwebmod.epa.gov/cdx-tri-quest/questionnaire?survey=8c377c33-7783-4905-bd58-541e97d9217b&target=c0768448-d638-4212-a8ce-012e10f47cb5>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 15, 2022.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Ezequiel Velez at [velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

TRI Coordinator

US EPA Region 4

UST & Data Management Section

61 Forsyth, St. S.W.

Atlanta, GA 30303

Tel. (404) 562-9191

[velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov)

[www.epa.gov/tri](http://www.epa.gov/tri)

### **EPA Email – OG-2**

Region 4 Email

04/12/2022 09:00am

From: *Ezequiel Velez*

Subject: Toxics Release Inventory (TRI) Data Quality Questions - Due April 29, 2022

| Sent To            | E-Mail Address          |
|--------------------|-------------------------|
| To: CRYSTAL SMITH  | CRYSTAL.SMITH1@USMC.MIL |
| To: RICHARD WEAVER | RICHARD.WEAVER@USMC.MIL |

Attachments:

### **UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Toxics Release Inventory (TRI) Data Quality Questions [(U.S. MARINE CORPS CHERRY POINT AIR STATION)  
(TRIFID: 28533SDDSMNCHWY)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Apr 12 13:00:10 UTC 2022

Dear CHRYSTAL SMITH and RICHARD WEAVER:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Cadmium compounds, Chromium compounds (except for chromite ore mined in the Transvaal Region) and Lead compounds submitted to EPA from your facility: U.S. MARINE CORPS CHERRY POINT AIR STATION) - (TRIFID: 28533SDDSMNCHWY) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- It appears your facility has sent approximately 155) shipments (sub eManifest IDs) totaling 196,284 pounds of hazardous waste listed containing Cadmium / Cadmium compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Cadmium / Cadmium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Cadmium / Cadmium compounds for reporting year 2020, if needed.
- It appears your facility has sent approximately 78) shipments (sub eManifest IDs) totaling 131,719 pounds of hazardous waste listed containing Lead / Lead compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Lead / Lead compounds for reporting year 2020. Could you please review your calculations and submit a new report for Lead / Lead compounds for reporting year 2020, if needed.
- It appears your facility has sent approximately 143) shipments (sub eManifest IDs) totaling 158,460 pounds of hazardous waste listed containing Chromium / Chromium compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Chromium / Chromium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Chromium / Chromium compounds for reporting year 2020, if needed.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 6 hazardous waste shipments (some e-Manifest #: 6) totaling 176,888 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

*Step 1:*

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=bff44957-08bc-4f8b-8c6c-025a66981aa9&target=c0768448-d638-4212-a8ce-012e10f47cb5>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

Step 2:

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022.**

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If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Ezequiel Velez at [velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

TRI Coordinator

US EPA Region 4

UST & Data Management Section

61 Forsyth, St. S.W.

Atlanta, GA 30303

Tel. (404) 562-9191

[velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov)

[www.epa.gov/tri](http://www.epa.gov/tri)

**Email sent on 03/15/2022 11:51am**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Toxics Release Inventory (TRI) Data Quality Questions [(U.S. MARINE CORPS CHERRY POINT AIR STATION)  
(TRIFID: 28533SDDSMNCHWY)] Form R for Reporting Year(s) 2020 - Due April 15, 2022**

Tue Mar 15 11:51:13 EDT 2022

Dear CRYSTAL SMITH and RICHARD WEAVER:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Cadmium compounds, Chromium compounds (except for chromite ore mined in the Transvaal Region) and Lead compounds submitted to EPA from your facility: U.S. MARINE CORPS CHERRY POINT AIR STATION) - (TRIFID: 28533SDDSMNCHWY) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- It appears your facility has sent approximately 155) shipments (sub eManifest IDs) totaling 196,284 pounds of hazardous waste listed containing Cadmium / Cadmium compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Cadmium / Cadmium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Cadmium / Cadmium compounds for reporting year 2020, if needed.
- It appears your facility has sent approximately 78) shipments (sub eManifest IDs) totaling 131,719 pounds of hazardous waste listed containing Lead / Lead compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Lead / Lead compounds for reporting year 2020. Could you please review your calculations and submit a new report for Lead / Lead compounds for reporting year 2020, if needed.
- It appears your facility has sent approximately 143) shipments (sub eManifest IDs) totaling 158,460 pounds of hazardous waste listed containing Chromium / Chromium compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Chromium / Chromium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Chromium / Chromium compounds for reporting year 2020, if needed.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 6 hazardous waste shipments (some e-Manifest #: 6) totaling 176,888 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

*Step 1:*

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=8c377c33-7783-4905-bd58-541e97d9217b&target=c0768448-d638-4212-a8ce-012e10f47cb5>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

Step 2:

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 15, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Ezequiel Velez at [velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

TRI Coordinator

US EPA Region 4

UST & Data Management Section

61 Forsyth, St. S.W.

Atlanta, GA 30303

Tel. (404) 562-9191

[velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov)

[www.epa.gov/tri](http://www.epa.gov/tri)

## EPA Email – OG-3

Region 4 Email

04/18/2022 08:14am

From: *Ezequiel Velez*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To            | E-Mail Address          |
|--------------------|-------------------------|
| To: CRYSTAL SMITH  | CRYSTAL.SMITH1@USMC.MIL |
| To: RICHARD WEAVER | RICHARD.WEAVER@USMC.MIL |

Attachments:

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 4

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

Mon Apr 18 12:14:01 UTC 2022

Dear CRYSTAL SMITH and RICHARD WEAVER:

EPA would like to inform you that data quality issues raised for your facility [U.S. MARINE CORPS CHERRY POINT AIR STATION (TRIFID: 28533SDDSMNCHWY)] during reporting year 2020 Adhoc Data Quality Checks are resolved for the following:

#### Reporting Year(s) Chemicals

2020 Cadmium compounds, Chromium compounds (except for chromite ore mined in the Transvaal Region) and Lead compounds

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Ezequiel Velez

TRI Data Quality Program

US EPA

Region 4

Email sent on 04/15/2022 05:00pm

## Facility Response – IC-1

U.S. MARINE CORPS CHERRY POINT AIR STATION - 28533SDDSMNCHWY submitted a web response on Apr 15, 2022 4:59:53 PM. A PDF copy of the web response is attached.

#### Message Details

Subject: Facility Response Form

Apr 15, 2022 3:56:21 PM

From: Richard Weaver

(252) 466-5917

richard.weaver@usmc.mil

Contractor Company Name: MSEGroup

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

#### EMAN-RNO RY 2020

- It appears your facility has sent approximately 143) shipments (sub eManifest IDs) totaling 158,460 pounds of hazardous waste listed containing Chromium / Chromium compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Chromium / Chromium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Chromium / Chromium compounds for reporting year 2020, if needed.
- It appears your facility has sent approximately 155) shipments (sub eManifest IDs) totaling 196,284 pounds of hazardous waste listed containing Cadmium / Cadmium compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Cadmium / Cadmium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Cadmium / Cadmium compounds for reporting year 2020, if needed.
- It appears your facility has sent approximately 78) shipments (sub eManifest IDs) totaling 131,719 pounds of hazardous waste listed containing Lead / Lead compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Lead / Lead compounds for reporting year 2020. Could you please review your calculations and submit a new report for Lead / Lead compounds for reporting year 2020, if needed.

The source of these releases and quantities are listed below:

| Reported Chemical   | Reporting Year (if Response applicable)   |
|---------------------|---|
| Cadmium compounds   | No Change   |
| Reason for Response | We evaluated EPCRA Section 313 activities and reviewed materials used at the facility from RY 2020 that contained cadmium/cadmium compounds and determined that such compounds did not exceed their established thresholds. Waste transfers from RY 2020 were also evaluated to determine any additional pathways which should be included in the TRI threshold evaluation for RY |

| Reported Chemical  | Reporting Year<br>(if Response applicable)  |
|--|---|
|  | <p>2020. Waste transfers in RY 2020 containing the D006 waste code for cadmium were based on TCLP analysis, user knowledge, or conservative assumptions regarding the waste generation activities. However, the quantity of D006 waste shipped off-site also includes other components (e.g., debris, containers, etc.) and does not solely reflect the weight of the TRI chemical. The quantity of waste shipped off-site also does not equate to material usage and EPCRA Section 313 threshold activities during RY 2020. Based on the evaluation of the material usage and waste data from RY 2020, cadmium/cadmium compounds did not exceed any EPCRA Section 313 activity reporting thresholds and was not required to be reported on a Form R for RY 2020. Therefore, no change is needed.</p> |
| Chromium compounds (except for chromite ore mined in the Transvaal Region) | No Change   |
| Reason for Response  | <p>We evaluated EPCRA Section 313 activities and reviewed materials used at the facility from RY 2020 that contained chromium/chromium compounds and determined that such compounds did not exceed their established thresholds. Waste transfers from RY 2020 were also evaluated to determine any additional pathways which should be included in the TRI threshold evaluation for RY 2020. Waste transfers in RY 2020 containing the D007 waste code for chromium</p>   |

| Reported Chemical   | Reporting<br>Year<br>(if<br>Response applicable)  |
|---------------------|---|
|                     | <p>were based on TCLP analysis, user knowledge, or conservative assumptions regarding the waste generation activities. However, the quantity of D007 waste shipped off-site also includes other components (e.g., debris, containers, etc.) and does not solely reflect the weight of the TRI chemical. The quantity of waste shipped off-site also does not equate to material usage and EPCRA Section 313 threshold activities during RY 2020. Based on the evaluation of the material usage and waste data from RY 2020, chromium/chromium compounds did not exceed any EPCRA Section 313 activity reporting thresholds and was not required to be reported on a Form R for RY 2020. Therefore, no change is needed.</p> |
| Lead compounds      | No<br>Change  |
| Reason for Response | <p>We evaluated EPCRA Section 313 activities and reviewed materials used at the facility from RY 2020 that contained lead compounds and determined that such compounds did not exceed their established thresholds. Waste transfers from RY 2020 were also evaluated to determine any additional pathways which should be included in the TRI threshold evaluation for RY 2020. Waste transfers in RY 2020 containing the D008 waste code for lead were based on TCLP analysis, user knowledge, or conservative assumptions</p>   |

| Reported Chemical | Reporting Year<br>(if applicable)<br>Response   |
|-------------------|---|
|                   | <p>regarding the waste generation activities. These waste transfers include quantities of lead and lead compounds, which are evaluated separately under EPCRA Section 313.</p> <p>Additionally, the quantity of D008 waste shipped off-site also includes other components (e.g., debris, containers, etc.) and does not solely reflect the weight of a TRI chemical. Therefore, the quantity of waste shipped off-site does not equate to material usage and EPCRA Section 313 threshold activities during RY 2020.</p> <p>Based on the evaluation of the material usage and waste data from RY 2020, lead compounds did not exceed any EPCRA Section 313 activity reporting thresholds and was not required to be reported on a Form R for RY 2020. Therefore, no change is needed.</p> |

PFAS-NOT-F RY 2020

The source of these releases and quantities are listed below:

| Response            | Reporting Year<br>(if applicable)  |
|---------------------|--|
| No Change           |  |
| Reason for Response | <p>We evaluated EPCRA Section 313 activities and reviewed materials used at the facility from RY 2020 and determined that there was no identified usage of PFAS compounds. Waste transfers from RY 2020 were also evaluated to determine any additional pathways which should be included in the TRI threshold evaluation for RY 2020. Based on EPCRA Section 313 Industry Guidance Chemical Distribution Facilities (January 1999) (EPA 745-B-99-005), waste that is transferred off-site for treatment, disposal, or energy recovery is not considered repackaged or distributed in commerce and is therefore not considered processed. Based on manifests for AFFF shipped off-site that potentially contained PFAS, the AFFF that was removed during CY 2020 was shipped off-site for either disposal or energy recovery. Therefore, the AFFF removed during CY 2020 was not considered processed, and the individual PFAS EPCRA Section 313 reporting threshold was not applicable. Additionally, only waste that is treated for destruction, stabilization, or disposed on-site must be evaluated for the otherwise use threshold. Since AFFF was not treated or disposed of on-site at the facility, the AFFF was also not considered otherwise used,</p> |

| Response  | Reporting Year<br>(if applicable) |
|---|-----------------------------------|
| and the individual PFAS EPCRA Section 313 reporting threshold was not applicable. Based on the evaluation of the material usage and waste data from RY 2020, PFAS did not exceed any EPCRA Section 313 activity reporting thresholds and was not required to be reported on a Form R for RY 2020. Therefore, no change is needed. |                                   |

### Facility Response – IC-2

Subject: Facility Response Form

Apr 15, 2022 4:59:53 PM

From: Richard Weaver

(252) 466-5917

richard.weaver@usmc.mil

Contractor Company Name: MSEGroup

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

EMAN-RNO RY 2020

- It appears your facility has sent approximately 143) shipments (sub eManifest IDs) totaling 158,460 pounds of hazardous waste listed containing Chromium / Chromium compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Chromium / Chromium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Chromium / Chromium compounds for reporting year 2020, if needed.
- It appears your facility has sent approximately 155) shipments (sub eManifest IDs) totaling 196,284 pounds of hazardous waste listed containing Cadmium / Cadmium compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Cadmium / Cadmium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Cadmium / Cadmium compounds for reporting year 2020, if needed.
- It appears your facility has sent approximately 78) shipments (sub eManifest IDs) totaling 131,719 pounds of hazardous waste listed containing Lead / Lead compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Lead / Lead compounds for reporting year 2020. Could you please review your calculations and submit a new report for Lead / Lead compounds for reporting year 2020, if needed.

The source of these releases and quantities are listed below:

| Reported Chemical   | Reporting Year<br>(if applicable)<br>Response   |
|---------------------|---|
| Cadmium compounds   | No Change   |
| Reason for Response | We evaluated EPCRA Section 313 activities and reviewed materials used at the facility from RY 2020 that contained cadmium/cadmium compounds and determined that such compounds did not exceed their established thresholds. Waste transfers |

| Reported Chemical  | Reporting Year<br>(if Response applicable)  |
|--|---|
|  | <p>from RY 2020 were also evaluated to determine any additional pathways which should be included in the TRI threshold evaluation for RY 2020. Waste transfers in RY 2020 containing the D006 waste code for cadmium were based on TCLP analysis, user knowledge, or conservative assumptions regarding the waste generation activities. However, the quantity of D006 waste shipped off-site also includes other components (e.g., debris, containers, etc.) and does not solely reflect the weight of the TRI chemical. The quantity of waste shipped off-site also does not equate to material usage and EPCRA Section 313 threshold activities during RY 2020. Based on the evaluation of the material usage and waste data from RY 2020, cadmium/cadmium compounds did not exceed any EPCRA Section 313 activity reporting thresholds and was not required to be reported on a Form R for RY 2020. Therefore, no change is needed.</p> |
| Chromium compounds (except for chromite ore mined in the Transvaal Region) | No Change   |
| Reason for Response  | <p>We evaluated EPCRA Section 313 activities and reviewed materials used at the facility from RY 2020 that contained chromium/chromium compounds and determined that such compounds did not exceed their established thresholds. Waste transfers from RY 2020 were also evaluated to determine any additional pathways which</p>  |

| Reported Chemical   | Reporting Year<br>(if applicable)<br>Response  |
|---------------------|--|
|                     | <p>should be included in the TRI threshold evaluation for RY 2020. Waste transfers in RY 2020 containing the D007 waste code for chromium were based on TCLP analysis, user knowledge, or conservative assumptions regarding the waste generation activities. However, the quantity of D007 waste shipped off-site also includes other components (e.g., debris, containers, etc.) and does not solely reflect the weight of the TRI chemical. The quantity of waste shipped off-site also does not equate to material usage and EPCRA Section 313 threshold activities during RY 2020. Based on the evaluation of the material usage and waste data from RY 2020, chromium/chromium compounds did not exceed any EPCRA Section 313 activity reporting thresholds and was not required to be reported on a Form R for RY 2020. Therefore, no change is needed.</p> |
| Lead compounds      | No Change  |
| Reason for Response | <p>We evaluated EPCRA Section 313 activities and reviewed materials used at the facility from RY 2020 that contained lead compounds and determined that such compounds did not exceed their established thresholds. Waste transfers from RY 2020 were also evaluated to determine any additional pathways which should be included in the TRI threshold evaluation for RY 2020. Waste</p>  |

| Reported Chemical | Reporting Year<br>(if applicable)<br>Response   |
|-------------------|---|
|                   | <p>transfers in RY 2020 containing the D008 waste code for lead were based on TCLP analysis, user knowledge, or conservative assumptions regarding the waste generation activities. These waste transfers include quantities of lead and lead compounds, which are evaluated separately under EPCRA Section 313. Additionally, the quantity of D008 waste shipped off-site also includes other components (e.g., debris, containers, etc.) and does not solely reflect the weight of a TRI chemical. Therefore, the quantity of waste shipped off-site does not equate to material usage and EPCRA Section 313 threshold activities during RY 2020. Based on the evaluation of the material usage and waste data from RY 2020, lead compounds did not exceed any EPCRA Section 313 activity reporting thresholds and was not required to be reported on a Form R for RY 2020. Therefore, no change is needed.</p> |

PFAS-NOT-F RY 2020

The source of these releases and quantities are listed below:

| Response            | Reporting Year<br>(if applicable)  |
|---------------------|--|
| No Change           |  |
| Reason for Response | <p>We evaluated EPCRA Section 313 activities and reviewed materials used at the facility from RY 2020 and determined that there was no identified usage of PFAS compounds. Waste transfers from RY 2020 were also evaluated to determine any additional pathways which should be included in the TRI threshold evaluation for RY 2020. Based on EPCRA Section 313 Industry Guidance Chemical Distribution Facilities (January 1999) (EPA 745-B-99-005), waste that is transferred off-site for treatment, disposal, or energy recovery is not considered repackaged or distributed in commerce and is therefore not considered processed. Based on manifests for AFFF shipped off-site that potentially contained PFAS, the AFFF that was removed during CY 2020 was</p> |

| Response   | Reporting Year<br>(if applicable) |
|--|-----------------------------------|
| <p>shipped off-site for disposal. Therefore, the AFFF removed during CY 2020 was not considered processed, and the individual PFAS EPCRA Section 313 reporting threshold was not applicable. Additionally, only waste that is treated for destruction, stabilization, or disposed on-site must be evaluated for the otherwise use threshold. Since AFFF was not treated or disposed of on-site at the facility, the AFFF was also not considered otherwise used, and the individual PFAS EPCRA Section 313 reporting threshold was not applicable. Based on the evaluation of the material usage and waste data from RY 2020, PFAS did not exceed any EPCRA Section 313 activity reporting thresholds and was not required to be reported on a Form R for RY 2020. Therefore, no change is needed.</p> |                                   |

**MCIEAST-MCB CAMLEJ MAIN FACILITY (28542CMPLJATTNA)  
12 POST LN, CAMP LEJEUNE, NC 28547 (Region 4)**

**EPA Email – OG-1**

Region 4 Email

03/15/2022 06:52am

From: *Ezequiel Velez*

Subject: Toxics Release Inventory (TRI) Data Quality Questions - Due April 15, 2022

| Sent To                | E-Mail Address              |
|------------------------|-----------------------------|
| To: NAT G. FAHY        | NAT.FAHY@USMC.MIL           |
| To: KATHERINE PROFFITT | KATHERINE.PROFFITT@USMC.MIL |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Toxics Release Inventory (TRI) Data Quality Questions [(MCIEAST-MCB CAMLEJ MAIN FACILITY) (TRIFID: 28542CMPLJATTNA)] Form R for Reporting Year(s) 2020 - Due April 15, 2022**

Tue Mar 15 10:51:57 EDT 2022

Dear KATHERINE PROFFITT and NAT G. FAHY:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: MCIEAST-MCB CAMLEJ MAIN FACILITY) - (TRIFID: 28542CMPLJATTNA) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 6 hazardous waste shipments (some e-Manifest #s: 6) totaling 91,516 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

Step 1:

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=c7b9c673-eea6-4fd8-8e4a-173e342192ad&target=3f4df219-3847-4580-8b24-631c11f7f339>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

Step 2:

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 15, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Ezequiel Velez at [velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

TRI Coordinator

US EPA Region 4

UST & Data Management Section

61 Forsyth, St. S.W.

Atlanta, GA 30303

Tel. (404) 562-9191

[velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov)

[www.epa.gov/tri](http://www.epa.gov/tri)

## EPA Email – OG-2

Region 4 Email

04/07/2022 08:17am

From: *Ezequiel Velez*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To                | E-Mail Address              |
|------------------------|-----------------------------|
| To: NAT G. FAHY        | NAT.FAHY@USMC.MIL           |
| To: KATHERINE PROFFITT | KATHERINE.PROFFITT@USMC.MIL |

Attachments:

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 4

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

Thu Apr 07 12:17:46 UTC 2022

Dear KATHERINE PROFFITT and NAT G. FAHY:

EPA would like to inform you that data quality issues raised for your facility [MCIEAST-MCB CAMLEJ MAIN FACILITY (TRIFID: 28542CMPLJATTNA)] during reporting year 2020 Adhoc Data Quality Checks are resolved for the following:

#### Reporting Year(s) Chemicals

2020 No chemicals

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Ezequiel Velez

TRI Data Quality Program

US EPA

Region 4

Email sent on 04/06/2022 05:50pm

MCIEAST-MCB CAMLEJ MAIN FACILITY - 28542CMPLJATTNA submitted a web response on Apr 6, 2022 5:49:48 PM. A PDF copy of the web response is attached.

## Facility Response – IC-1

Subject: Facility Response Form  
From: Robert Lowder

(910) 451-9607

Apr 6, 2022 5:49:48 PM  
robert.a.lowder@usmc.mil

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

PFAS-NOT-F RY 2020

The source of these releases and quantities are listed below:

| Response               | Reporting Year<br>(if applicable)  |
|------------------------|--|
| No Change              |  |
| Reason for<br>Response | MCB Camp Lejeune located seven e-manifests in CY 2020 with AFFF listed in the U.S. DOT description. Two of these manifests from September 2020 are from potential soil impacts from AFFF being sprayed as a response to a plane crash that happened off the installation. Five of the manifests are for the disposal of AFFF utilized in the air craft hangers that no longer met the Performance Specifications available for use for the Department of Defense. The hanger systems were recharged with approximately 1,360,907 gallons of MIL-PRE-24385F(SH) type 3 compliant AFFF. In order to comply with the requirements of this military specification, PFOA & PFOS concentrations cannot exceed 800 or 25 ppb. Worst-case calculations indicate that the total PFAS and PFOA expressed from the recharging of this system did not trigger the threshold limit for otherwise use for reporting on a Form R for any of the specific chemicals listed in the TRI. Please contact me if you have any additional questions. |

.....

# GIANT RESOURCE RECOVERY-SUMTER INC (29151STHST755IN) 755 IND US TRIAL RD, SUMTER, SC 29150 (Region 4)

## EPA Email – OG-1

Region 4 Email

07/26/2021 06:15am

From: Ezequiel Velez

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(GIANT RESOURCE RECOVERY-SUMTER INC) (TRIFID: 29151STHST755IN)] for RY 2020 - Due September 10, 2021

| Sent To            | E-Mail Address    |
|--------------------|-------------------|
| To: JANICE TIMPSON | JTIMPSON@GCHI.COM |
| To: JANICE TIMPSON | JTIMPSON@GCHI.COM |

Attachments:

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Toxics Release Inventory (TRI) Data Quality Questions [(GIANT RESOURCE RECOVERY-SUMTER INC) (TRIFID: 29151STHST755IN)] Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Mon Jul 26 10:15:17 EDT 2021

Dear JANICE TIMPSON:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Hexafluoropropylene oxide dimer acid ammonium salt submitted to EPA from your facility [(Name: GIANT RESOURCE RECOVERY-SUMTER INC) - (TRIFID: 29151STHST755IN)] for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-)

cbi\_pfas\_list\_1\_8\_2021\_final.pdf) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Hexafluoropropylene oxide dimer acid ammonium salt to TRI for reporting year 2020, but might have received Hexafluoropropylene oxide dimer acid ammonium salt in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Hexafluoropropylene oxide dimer acid ammonium salt for reporting year 2020, if required.

***How do I respond to this inquiry?***

***Step 1:***

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=0c851b86-0dca-4806-9df4-97cc6e59015e&target=fa4fd83f-e33e-428c-bff1-9f238d65c02c>

***If you indicate new submission, revision or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you would like to make any revisions, withdrawals or new submissions, **please send them to EPA by September 10, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have any follow up questions, please contact Ezequiel Velez at (404) 562-9191 or email at [velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**EPA Email – OG-2**

Region 4 Email

07/28/2021 11:15am

From: *Ezequiel Velez*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To            | E-Mail Address    |
|--------------------|-------------------|
| To: JANICE TIMPSON | JTIMPSON@GCHI.COM |
| To: JANICE TIMPSON | JTIMPSON@GCHI.COM |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Region 4

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

Wed Jul 28 15:15:27 EDT 2021

Dear JANICE TIMPSON:

EPA would like to inform you that data quality issues raised for your facility [GIANT RESOURCE RECOVERY-SUMTER INC (TRIFID: 29151STHST755IN)] during reporting year 2020 Adhoc Data Quality Checks cycle are resolved for the following:

Reporting Year(s) Chemicals

2020 Hexafluoropropylene oxide dimer acid ammonium salt

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Ezequiel Velez

TRI Data Quality Program

US EPA

Region 4

**Email sent on 07/26/2021 10:15am**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Toxics Release Inventory (TRI) Data Quality Questions [(GIANT RESOURCE RECOVERY-SUMTER INC) (TRIFID: 29151STHST755IN)] Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Mon Jul 26 10:15:17 EDT 2021

Dear JANICE TIMPSON:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Hexafluoropropylene oxide dimer acid ammonium salt submitted to EPA from your facility [(Name: GIANT RESOURCE RECOVERY-SUMTER INC) - (TRIFID: 29151STHST755IN)] for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Hexafluoropropylene oxide dimer acid ammonium salt to TRI for reporting year 2020, but might have received Hexafluoropropylene oxide dimer acid ammonium salt in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Hexafluoropropylene oxide dimer acid ammonium salt for reporting year 2020, if required.

***How do I respond to this inquiry?***

***Step 1:***

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=0c851b86-0dca-4806-9df4-97cc6e59015e&target=fa4fd83f-e33e-428c-bff1-9f238d65c02c>

***If you indicate new submission, revision or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (

[32/index.html](#)), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you would like to make any revisions, withdrawals or new submissions, **please send them to EPA by September 10, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have any follow up questions, please contact Ezequiel Velez at (404) 562-9191 or email at [velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

### Facility Response – IC-1

Subject: Facility Response Form

Jul 28, 2021 1:02:51 PM

From: Michael T. Deyo

(804) 937-0377 [mdeyo@deyoenvironment.com](mailto:mdeyo@deyoenvironment.com)

Contractor Company Name: Deyo and Associates, LLC

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

PFAS-NOT RY 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Hexafluoropropylene oxide dimer acid ammonium salt to TRI for reporting year 2020, but might have received Hexafluoropropylene oxide dimer acid ammonium salt in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Hexafluoropropylene oxide dimer acid ammonium salt for reporting year 2020, if required.

The source of these releases and quantities are listed below:

| Reported Chemical                                  | Response  | Reporting Year<br>(if applicable) |
|--|---|-----------------------------------|
| Hexafluoropropylene oxide dimer acid ammonium salt | No Change   |                                   |
| Reason for Response                                | <p>Giant Resource Recovery Sumter, Inc. (GRR) operates a RCRA permitted hazardous waste storage and fuel blending facility at its Sumter, South Carolina location. GRR did receive the subject chemical during reporting year 2020. However, the waste that contained this chemical was received at the site and transferred to an off-site facility to be burned in an energy recovery operation. Accepting EPCRA Section 313 chemicals in waste and transferring that waste to a facility for energy recovery, treatment, or disposal is not considered "distribution in commerce" and therefore, the waste was not considered to have been "processed" or "otherwise used" at the GRR facility. Consequently, the EPCRA Section 313 chemical is not subject to EPCRA reporting. See USEPA "EPCRA Section 313 Industry Guidance, RCRA Subtitle C TSD Facilities and Solvent Recovery Facilities" (EPA 745-B-99-004), January 1999, Section 2.6, Page 2-12. Therefore, there are no revisions required to the GRR 2020 EPCRA TRI report for this chemical.</p> |                                   |

.....

**ORTEC INC (29640RTCNC201PI)**  
**505 GENTRY MEMORIAL HWY, EASLEY, SC 29640 (Region 4)**

**EPA Email – OG-1**

Region 4 Email

07/26/2021 06:30am

From: *Ezequiel Velez*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(ORTEC INC) (TRIFID: 29640RTCNC201PI)] for RY 2020 - Due September 10, 2021

| Sent To               | E-Mail Address         |
|-----------------------|------------------------|
| To: POLLY G. SWINDOLL | PSWINDOLL@ORTECINC.COM |
| To: POLLY G. SWINDOLL | PSWINDOLL@ORTECINC.COM |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Toxics Release Inventory (TRI) Data Quality Questions [(ORTEC INC) (TRIFID: 29640RTCNC201PI)] Form A and Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Mon Jul 26 10:30:15 EDT 2021

Dear POLLY G. SWINDOLL:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form A and Form R for 2-Propenoic acid, 2-methyl-, octadecyl ester, polymer with 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafuorododecyl 2-propenoate, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluorodecyl 2-propenoate and 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,14-pentacosafuorotetradecyl 2-propenoate submitted to EPA from your facility [(Name: ORTEC INC) - (TRIFID: 29640RTCNC201PI)] for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for 2-Propenoic acid, 2-methyl-, octadecyl ester, polymer with 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafuorododecyl 2-propenoate, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluorodecyl 2-propenoate and 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,14-pentacosafuorotetradecyl 2-propenoate to TRI for reporting year 2020, but might have reported this chemical, 2-Propenoic acid, 2-methyl-, octadecyl ester, polymer with 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafuorododecyl 2-propenoate, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluorodecyl 2-propenoate and 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,14-pentacosafuorotetradecyl 2-propenoate to 2020 CDR as manufactured / imported. Please review and submit new report for 2-Propenoic acid, 2-methyl-, octadecyl ester, polymer with 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafuorododecyl 2-propenoate, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluorodecyl 2-propenoate and 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,14-pentacosafuorotetradecyl 2-propenoate for reporting year 2020, if required.

***How do I respond to this inquiry?***

***Step 1:***

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=b5dee95e-d68c-4e8f-84d4-e1a21e7cb220&target=2da2bfc9-0b27-44d7-a519-cdef772f3832>

***If you indicate new submission, revision or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you would like to make any revisions, withdrawals or new submissions, **please send them to EPA by September 10, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have any follow up questions, please contact Ezequiel Velez at (404) 562-9191 or email at [velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**EPA Email – OG-2**

Region 4 Email

09/07/2021 04:56am

From: *Ezequiel Velez*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To               | E-Mail Address         |
|-----------------------|------------------------|
| To: POLLY G. SWINDOLL | PSWINDOLL@ORTECINC.COM |
| To: POLLY G. SWINDOLL | PSWINDOLL@ORTECINC.COM |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Region 4

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

Tue Sep 07 08:56:06 EDT 2021

Dear POLLY G. SWINDOLL:

EPA would like to inform you that data quality issues raised for your facility [ORTEC INC (TRIFID: 29640RTCNC201PI)] during reporting year 2020 Adhoc Data Quality Checks cycle are resolved for the following:

Reporting Year(s) Chemicals

2020 2-Propenoic acid, 2-methyl-, octadecyl ester, polymer with 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafuorododecyl 2-propenoate, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluorodecyl 2-propenoate and 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,14-pentacosafuorotetradecyl 2-propenoate

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Ezequiel Velez

TRI Data Quality Program

US EPA

Region 4

Email sent on 08/03/2021 03:10pm

ORTEC INC - 29640RTCNC201PI submitted a web response on Aug 3, 2021 3:10:06 PM. A PDF copy of the web response is attached.

### Facility Response – IC-1

Subject: Facility Response Form

Aug 3, 2021 3:10:06 PM

From: Michael Cade

(864) 850-4449

Mcade@ortecinc.com

Contractor Company Name: Ortec, Inc

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

PFAS-NOT RY 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for 2-Propenoic acid, 2-methyl-, octadecyl ester, polymer with 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafuorododecyl 2-propenoate, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluorodecyl 2-propenoate and 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,14-pentacosafuorotetradecyl 2-propenoate to TRI for reporting year 2020, but might have reported this chemical, 2-Propenoic acid, 2-methyl-, octadecyl ester, polymer with 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafuorododecyl 2-propenoate, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluorodecyl 2-propenoate and 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,14-pentacosafuorotetradecyl 2-propenoate to 2020 CDR as manufactured / imported. Please review and submit new report for 2-Propenoic acid, 2-methyl-, octadecyl ester, polymer with 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafuorododecyl 2-propenoate, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluorodecyl 2-propenoate and 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,14-pentacosafuorotetradecyl 2-propenoate for reporting year 2020, if required.

The source of these releases and quantities are listed below:

| Reported Chemical   | Response       | Reporting Year (if applicable) |
|---|----------------|--------------------------------|
| 2-Propenoic acid, 2-methyl-, octadecyl ester, polymer with 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafuorododecyl 2-propenoate, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluorodecyl 2-propenoate and 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,14-pentacosafuorotetradecyl 2-propenoate | New Submission | 2020                           |

|                     | Reported Chemical | Reporting Year<br>(if Response applicable)            |
|---------------------|-------------------|---|
| Reason for Response |                   | Individual constituents of one chemical was reported. |
| .....               |                   |   |

# NATION FORD CHEMICAL CO (29715RMNDSBANKS) 2300 BANKS ST, FORT MILL, SC 29715 (Region 4)

## EPA Email – OG-1

Region 4 Email

03/15/2022 06:55am

From: *Ezequiel Velez*

Subject: Toxics Release Inventory (TRI) Data Quality Questions - Due April 15, 2022

| Sent To               | E-Mail Address                 |
|-----------------------|--------------------------------|
| To: JAY DICKSON       | DICKSONJ@NATIONFORDCHEM.COM    |
| To: BROOKE DIDOMENICO | BDIDOMENICO@NATIONFORDCHEM.COM |

Attachments:

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

### Toxics Release Inventory (TRI) Data Quality Questions [(NATION FORD CHEMICAL CO) (TRIFID: 29715RMNDSBANKS)] Form R for Reporting Year(s) 2020 - Due April 15, 2022

Tue Mar 15 10:54:54 EDT 2022

Dear JAY DICKSON and BROOKE DIDOMENICO:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Nitric acid submitted to EPA from your facility: *NATION FORD CHEMICAL CO* - (TRIFID: 29715RMNDSBANKS) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 1 hazardous waste shipments (some e-Manifest #: 1) totaling 6,449 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

- It appears your facility has sent approximately 17) shipments (sub eManifest IDs) totaling 686,230 pounds of hazardous waste listed containing Nitric acid to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Nitric acid for reporting year 2020. Could you please review your calculations and submit a new report for Nitric acid for reporting year 2020, if needed.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=14d09f6d-2497-4093-b76b-cb3ba712a6c9&target=2a9a3b4a-373c-43a6-a466-45245dd0926c>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 15, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Ezequiel Velez at [velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

TRI Coordinator

US EPA Region 4

UST & Data Management Section

61 Forsyth, St. S.W.

Atlanta, GA 30303

Tel. (404) 562-9191

[velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov)

[www.epa.gov/tri](http://www.epa.gov/tri)

**EPA Email – OG-2**

Region 4 Email

04/12/2022 08:54am

From: *Ezequiel Velez*

Subject: Toxics Release Inventory (TRI) Data Quality Questions - Due April 29, 2022

| Sent To               | E-Mail Address                 |
|-----------------------|--------------------------------|
| To: JAY DICKSON       | DICKSONJ@NATIONFORDCHEM.COM    |
| To: BROOKE DIDOMENICO | BDIDOMENICO@NATIONFORDCHEM.COM |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Toxics Release Inventory (TRI) Data Quality Questions [(NATION FORD CHEMICAL CO) (TRIFID: 29715RMNDSBANKS)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Apr 12 12:54:48 UTC 2022

Dear JAY DICKSON and BROOKE DIDOMENICO:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Nitric acid submitted to EPA from your facility: *NATION FORD CHEMICAL CO*) - (TRIFID: 29715RMNDSBANKS) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS)

([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 1 hazardous waste shipments (some e-Manifest #: 1) totaling 6,449 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

- It appears your facility has sent approximately 17 shipments (sub eManifest IDs) totaling 686,230 pounds of hazardous waste listed containing Nitric acid to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Nitric acid for reporting year 2020. Could you please review your calculations and submit a new report for Nitric acid for reporting year 2020, if needed.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=bc4408a5-5480-4239-9303-eb95fe8386b5&target=2a9a3b4a-373c-43a6-a466-45245dd0926c>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Ezequiel Velez at [velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

TRI Coordinator

US EPA Region 4

UST & Data Management Section

61 Forsyth, St. S.W.

Atlanta, GA 30303

Tel. (404) 562-9191

[velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov)

[www.epa.gov/tri](http://www.epa.gov/tri)

Email sent on 03/16/2022 04:07pm

**EPA Email – OG-3**

Region 4 Email

04/18/2022 08:25am

From: Ezequiel Velez

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To               | E-Mail Address                 |
|-----------------------|--------------------------------|
| To: JAY DICKSON       | DICKSONJ@NATIONFORDCHEM.COM    |
| To: BROOKE DIDOMENICO | BDIDOMENICO@NATIONFORDCHEM.COM |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Region 4

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

Mon Apr 18 12:25:08 UTC 2022

Dear JAY DICKSON and BROOKE DIDOMENICO:

EPA would like to inform you that data quality issues raised for your facility [NATION FORD CHEMICAL CO (TRIFID: 29715RMNDSBANKS)] during reporting year 2020 Adhoc Data Quality Checks are resolved for the following:

Reporting Year(s) Chemicals

2020 Nitric acid

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Ezequiel Velez

TRI Data Quality Program

US EPA

Region 4

**Email sent on 04/12/2022 12:54pm**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Toxics Release Inventory (TRI) Data Quality Questions [(NATION FORD CHEMICAL CO) (TRIFID: 29715RMNDSBANKS)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Apr 12 12:54:48 UTC 2022

Dear JAY DICKSON and BROOKE DIDOMENICO:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Nitric acid submitted to EPA from your facility: *NATION FORD CHEMICAL CO* - (TRIFID: 29715RMNDSBANKS) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 1 hazardous waste shipments (some e-Manifest #s: 1) totaling 6,449 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

- It appears your facility has sent approximately 17) shipments (sub eManifest IDs) totaling 686,230 pounds of hazardous waste listed containing Nitric acid to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Nitric acid for reporting year 2020. Could you please review your calculations and submit a new report for Nitric acid for reporting year 2020, if needed.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=bc4408a5-5480-4239-9303-eb95fe8386b5&target=2a9a3b4a-373c-43a6-a466-45245dd0926c>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Ezequiel Velez at [velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez, TRI Coordinator

US EPA Region 4, UST & Data Management Section

61 Forsyth, St. S.W., Atlanta, GA 30303

Tel. (404) 562-9191

[velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov)

[www.epa.gov/tri](http://www.epa.gov/tri)

NATION FORD CHEMICAL CO - 29715RMNDSBANKS submitted a web response on Mar 16, 2022 8:07:11 PM. A PDF copy of the web response is attached.

### Facility Response – IC-1

Subject: Facility Response Form

Mar 16, 2022 8:07:11 PM

From: Brooke DiDomenico

(803) 548-3210

bdidomenico@nationfordchem.com

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

EMAN-RNO RY 2020

- It appears your facility has sent approximately 17) shipments (sub eManifest IDs) totaling 686,230 pounds of hazardous waste listed containing Nitric acid to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Nitric acid for reporting year 2020. Could you please review your calculations and submit a new report for Nitric acid for reporting year 2020, if needed.

The source of these releases and quantities are listed below:

| Reported Chemical   | Response   | Reporting Year<br>(if applicable) |
|---------------------|--|-----------------------------------|
| Nitric acid         | No Change  |                                   |
| Reason for Response | Nitric acid is required for TRI reporting when used at concentrations of 80% or greater. Our facility does not process any nitric acid at or above this concentration limit. |                                   |

PFAS-NOT-F RY 2020

The source of these releases and quantities are listed below:

| Response            | Reporting Year<br>(if applicable)  |
|---------------------|--|
| No Change           |  |
| Reason for Response | This facility does not process any PFAS included on the list covered by TRI. |

.....

# ATOTECH USA LLC (29731TTCHS17500) 1750 OVERVIEW DR, ROCK HILL, SC 29730 (Region 4)

## EPA Email – OG-1

Headquarters Email

07/25/2021 03:30pm

From: *Velu Senthil*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(ATOTECH USA LLC) (TRIFID: 29731TTCHS17500)] for RY 2020 - Due September 10, 2021

| Sent To          | E-Mail Address           |
|------------------|--------------------------|
| To: JERRY KAPUTA | JERRY.KAPUTA@ATOTECH.COM |
| To: IAN KEEFE    | IAN.KEEFE@ATOTECH.COM    |

Attachments:

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

**Toxics Release Inventory (TRI) Data Quality Questions [(ATOTECH USA LLC) (TRIFID: 29731TTCHS17500)] Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Sun Jul 25 19:30:29 EDT 2021

Dear IAN KEEFE and JERRY KAPUTA:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Ethanaminium, N,N,N-triethyl-, salt with 1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,8-heptadecafluoro-1-octanesulfonic acid (1:1) submitted to EPA from your facility [(Name: ATOTECH USA LLC) - (TRIFID: 29731TTCHS17500)] for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-)

cbi\_pfas\_list\_1\_8\_2021\_final.pdf) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Ethanaminium, N,N,N-triethyl-, salt with 1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,8-heptadecafluoro-1-octanesulfonic acid (1:1) to TRI for reporting year 2020, but might have reported this chemical, Ethanaminium, N,N,N-triethyl-, salt with 1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,8-heptadecafluoro-1-octanesulfonic acid (1:1) to 2016 CDR as manufactured / imported. Please review and submit new report for Ethanaminium, N,N,N-triethyl-, salt with 1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,8-heptadecafluoro-1-octanesulfonic acid (1:1) for reporting year 2020, if required.

***How do I respond to this inquiry?***

***Step 1:***

lease respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=c0f80ec8-5790-4e11-aed4-23d26fed8949&target=a0234eb2-641b-420f-b26e-c51f101135f3>

***If you indicate new submission, revision or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you would like to make any revisions, withdrawals or new submissions, **please send them to EPA by September 10, 2021.**

lease do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have any follow up questions, please contact Velu Senthil at (202) 566-0749 or email at [senthil.velu@epa.gov](mailto:senthil.velu@epa.gov). [Message Details](#)

**EPA Email – OG-2**

Headquarters Email  
07/27/2021 06:22am  
From: *Velu Senthil*  
Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To          | E-Mail Address           |
|------------------|--------------------------|
| To: JERRY KAPUTA | JERRY.KAPUTA@ATOTECH.COM |

| Sent To       | E-Mail Address        |
|---------------|-----------------------|
| To: IAN KEEFE | IAN.KEEFE@ATOTECH.COM |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

Tue Jul 27 10:22:43 EDT 2021

Dear IAN KEEFE and JERRY KAPUTA:

EPA would like to inform you that data quality issues raised for your facility [ATOTECH USA LLC (TRIFID: 29731TTCHS17500)] during reporting year 2020 Adhoc Data Quality Checks cycle are resolved for the following:

Reporting Year(s) Chemicals

2020 Ethanaminium, N,N,N-triethyl-, salt with 1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,8-heptadecafluoro-1-octanesulfonic acid (1:1)

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Velu Senthil

TRI Data Quality Program

**Email sent on 07/27/2021 10:03am**

ATOTECH USA LLC - 29731TTCHS17500 submitted a web response on Jul 27, 2021 10:02:58 AM. A PDF copy of the web response is attached.

**Facility Response – IC-1**

Subject: Facility Response Form

Jul 27, 2021 10:02:58 AM

From: Ian Keefe

(803) 817-3613 ian.keefe@atotech.com

Contractor Company Name: Atotech USA, LLC

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

PFAS-NOT RY 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI),

and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Ethanaminium, N,N,N-triethyl-, salt with 1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,8-heptadecafluoro-1-octanesulfonic acid (1:1) to TRI for reporting year 2020, but might have reported this chemical, Ethanaminium, N,N,N-triethyl-, salt with 1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,8-heptadecafluoro-1-octanesulfonic acid (1:1) to 2016 CDR as manufactured / imported. Please review and submit new report for Ethanaminium, N,N,N-triethyl-, salt with 1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,8-heptadecafluoro-1-octanesulfonic acid (1:1) for reporting year 2020, if required.

The source of these releases and quantities are listed below:

| Reported Chemical  | Response   | Reporting Year<br>(if applicable) |
|--|--|-----------------------------------|
| Ethanaminium, N,N,N-triethyl-, salt with 1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,8-heptadecafluoro-1-octanesulfonic acid (1:1) | No Change  |                                   |
| Reason for Response  | The single product that contained Ethanaminium, N,N,N-triethyl-, salt with 1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,8-heptadecafluoro-1-octanesulfonic acid (1:1) (CAS#56773-42-3) was discontinued by Atotech USA in 2018, prior to the reporting requirements of the NDAA and US EPA. |                                   |

.....

**ARCHROMA US INC (29836SNDZCHIGHW)**  
**788 CHERT QUARRY RD, MARTIN, SC 29836 (Region 4)**

**EPA Email – OG-1**

Headquarters Email

07/25/2021 03:31pm

From: *Velu Senthil*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(ARCHROMA US INC) (TRIFID: 29836SNDZCHIGHW)]  
for RY 2020 - Due September 10, 2021

| Sent To        | E-Mail Address          |
|----------------|-------------------------|
| To: CHAD PERRY | CHAD.PERRY@ARCHROMA.COM |
| To: CHAD PERRY | CHAD.PERRY@ARCHROMA.COM |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

**Toxics Release Inventory (TRI) Data Quality Questions [(ARCHROMA US INC) (TRIFID: 29836SNDZCHIGHW)] Form  
A and Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Sun Jul 25 19:31:15 EDT 2021

Dear CHAD PERRY:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form A and Form R for 1,1,2,2-Tetrahydroperfluorododecyl acrylate, 1,1,2,2-Tetrahydroperfluorotetradecyl acrylate, Alcohols, C8-14, γ-ω-perfluoro, Decane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10-heneicosafuoro-12-iodo-, Dodecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10-heneicosafuoro-12-iodo- and Tetradecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12-pentacosafuoro-14-iodo- submitted to EPA from your facility [(Name: ARCHROMA US INC) - (TRIFID: 29836SNDZCHIGHW)] for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Decane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8-heptadecafluoro-10-iodo- to TRI for reporting year 2020, but might have reported this chemical, Decane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8-heptadecafluoro-10-iodo- to 2016 CDR as manufactured / imported. Please review and submit new report for Decane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8-heptadecafluoro-10-iodo- for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for 1,1,2,2-Tetrahydroperfluorododecyl acrylate to TRI for reporting year 2020, but might have reported this chemical, 1,1,2,2-Tetrahydroperfluorododecyl acrylate to 2016 CDR as manufactured / imported. Please review and submit new report for 1,1,2,2-Tetrahydroperfluorododecyl acrylate for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Alcohols, C8-14,  $\gamma$ - $\omega$ -perfluoro to TRI for reporting year 2020, but might have reported this chemical, Alcohols, C8-14,  $\gamma$ - $\omega$ -perfluoro to 2016 CDR as manufactured / imported. Please review and submit new report for Alcohols, C8-14,  $\gamma$ - $\omega$ -perfluoro for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for 1,1,2,2-Tetrahydroperfluorotetradecyl acrylate to TRI for reporting year 2020, but might have reported this chemical, 1,1,2,2-Tetrahydroperfluorotetradecyl acrylate to 2016 CDR as manufactured / imported. Please review and submit new report for 1,1,2,2-Tetrahydroperfluorotetradecyl acrylate for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Dodecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10-heneicosafuoro-12-iodo- to TRI for reporting year 2020, but might have reported this chemical, Dodecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10-heneicosafuoro-12-iodo- to 2016 CDR as manufactured / imported. Please review and submit new report for Dodecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10-heneicosafuoro-12-iodo- for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Tetradecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12-pentacosafuoro-14-iodo- to TRI for reporting year 2020, but might have reported this chemical, Tetradecane,

1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12-pentacosafuoro-14-iodo- to 2016 CDR as manufactured / imported. Please review and submit new report for Tetradecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12-pentacosafuoro-14-iodo- for reporting year 2020, if required.

***How do I respond to this inquiry?***

***Step 1:***

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=e6aebab7-c4df-4526-8e1e-4063c458a4d7&target=9ae6315a-ee8a-4a9b-a2b2-7769599ed2d8>

***If you indicate new submission, revision or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you would like to make any revisions, withdrawals or new submissions, **please send them to EPA by September 10, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have any follow up questions, please contact Velu Senthil at (202) 566-0749 or email at [senthil.velu@epa.gov](mailto:senthil.velu@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Velu Senthil, 1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

**Facility Response – IC-1**

**From:** TRI QuEST <[noreply@epacdx.net](mailto:noreply@epacdx.net)>

**Sent:** Monday, July 26, 2021 3:00 PM

**To:** Senthil, Velu <[Senthil.Velu@epa.gov](mailto:Senthil.Velu@epa.gov)>

**Subject:** TRI QUEST - New Facility Web Response Received - ARCHROMA US INC - 29836SNDZCHIGHW

ARCHROMA US INC - 29836SNDZCHIGHW submitted a web response on Jul 26, 2021 2:58:50 PM. Please log into QUEST to review the target for ARCHROMA US INC in Region 4 and Target Year DQ2020NA.

## Facility Response – IC-2

Subject: Facility Response Form

Jul 26, 2021 2:58:50 PM

From: Chad Perry

(803) 584-4321 chad.perry@archroma.com

Contractor Company Name: Archroma U.S., Inc.

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

### PFAS-NOT RY 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for 1,1,2,2-Tetrahydroperfluorododecyl acrylate to TRI for reporting year 2020, but might have reported this chemical, 1,1,2,2-Tetrahydroperfluorododecyl acrylate to 2016 CDR as manufactured / imported. Please review and submit new report for 1,1,2,2-Tetrahydroperfluorododecyl acrylate for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for 1,1,2,2-Tetrahydroperfluorotetradecyl acrylate to TRI for reporting year 2020, but might have reported this chemical, 1,1,2,2-Tetrahydroperfluorotetradecyl acrylate to 2016 CDR as manufactured / imported. Please review and submit new report for 1,1,2,2-Tetrahydroperfluorotetradecyl acrylate for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Alcohols, C8-14,  $\gamma$ - $\omega$ -perfluoro to TRI for reporting year 2020, but might have reported this chemical, Alcohols, C8-14,  $\gamma$ - $\omega$ -perfluoro to 2016 CDR as manufactured / imported. Please review and submit new report for Alcohols, C8-14,  $\gamma$ - $\omega$ -perfluoro for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Decane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8-heptafluoro-10-iodo- to TRI for reporting year 2020, but might have reported this chemical, Decane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8-heptafluoro-10-iodo- to 2016 CDR as manufactured / imported. Please review and submit new report for Decane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8-heptafluoro-10-iodo- for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS)

([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Dodecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10-heneicosafuoro-12-iodo- to TRI for reporting year 2020, but might have reported this chemical, Dodecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10-heneicosafuoro-12-iodo- to 2016 CDR as manufactured / imported. Please review and submit new report for Dodecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10-heneicosafuoro-12-iodo- for reporting year 2020, if required.

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Tetradecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12-pentacosafuoro-14-iodo- to TRI for reporting year 2020, but might have reported this chemical, Tetradecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12-pentacosafuoro-14-iodo- to 2016 CDR as manufactured / imported. Please review and submit new report for Tetradecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12-pentacosafuoro-14-iodo- for reporting year 2020, if required.

The source of these releases and quantities are listed below:

| Reported Chemical  | Reporting Year (if Response applicable) |
|--|---|
| 1,1,2,2-Tetrahydroperfluorododecyl acrylate  | No Change                               |
| Reason for Response  |   |
| 1,1,2,2-Tetrahydroperfluorotetradecyl acrylate   | No Change                               |
| Reason for Response  |   |
| Alcohols, C8-14, $\gamma$ - $\omega$ -perfluoro  | No Change                               |
| Reason for Response  |   |
| Decane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8-heptadecafluoro-10-iodo-                           | No Change                               |
| Reason for Response  |   |
| Dodecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10-heneicosafuoro-12-iodo-                | No Change                               |
| Reason for Response  |   |
| Tetradecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12-pentacosafuoro-14-iodo- | No Change                               |
| Reason for Response  |   |

### Facility Response – IC-3

Subject: Facility Response Form  
From: Chad Perry

Jul 28, 2021 11:19:41 AM  
(180) 358-443216248 chad.perry@archroma.com

Contractor Company Name: Archroma U.S., Inc.

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

PFAS-NOT RY 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for 1,1,2,2-Tetrahydroperfluorododecyl acrylate to TRI for reporting year 2020, but might have reported this chemical, 1,1,2,2-Tetrahydroperfluorododecyl acrylate to 2016 CDR as manufactured / imported. Please review and submit new report for 1,1,2,2-Tetrahydroperfluorododecyl acrylate for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for 1,1,2,2-Tetrahydroperfluorotetradecyl acrylate to TRI for reporting year 2020, but might have reported this chemical, 1,1,2,2-Tetrahydroperfluorotetradecyl acrylate to 2016 CDR as manufactured / imported. Please review and submit new report for 1,1,2,2-Tetrahydroperfluorotetradecyl acrylate for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Alcohols, C8-14,  $\gamma$ - $\omega$ -perfluoro to TRI for reporting year 2020, but might have reported this chemical, Alcohols, C8-14,  $\gamma$ - $\omega$ -perfluoro to 2016 CDR as manufactured / imported. Please review and submit new report for Alcohols, C8-14,  $\gamma$ - $\omega$ -perfluoro for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Decane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8-heptadecafluoro-10-iodo- to TRI for reporting year 2020, but might have reported this chemical, Decane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8-heptadecafluoro-10-iodo- to 2016 CDR as manufactured / imported. Please review and submit new report for Decane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8-heptadecafluoro-10-iodo- for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Dodecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10-heneicosafluoro-12-iodo- to TRI for reporting year 2020, but might have reported this chemical, Dodecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10-heneicosafluoro-12-iodo- to 2016 CDR as manufactured / imported. Please review and submit new report for Dodecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10-heneicosafluoro-12-iodo- for reporting year 2020, if required.

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Tetradecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12-pentacosafuoro-14-iodo- to TRI for reporting year 2020, but might have reported this chemical, Tetradecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12-pentacosafuoro-14-iodo- to 2016 CDR as manufactured / imported. Please review and submit new report for Tetradecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12-pentacosafuoro-14-iodo- for reporting year 2020, if required.

The source of these releases and quantities are listed below:

| Reported Chemical  | Reporting Year (if Response applicable)  |
|--|--|
| 1,1,2,2-Tetrahydroperfluorododecyl acrylate  | Other  |
| Reason for Response  | Per Archroma Product Stewardship no reportable PFAS were imported or produced. |
| 1,1,2,2-Tetrahydroperfluorotetradecyl acrylate   | Other  |
| Reason for Response  | Per Archroma Product Stewardship no reportable PFAS were imported or produced. |
| Alcohols, C8-14, γ-ω-perfluoro   | Other  |
| Reason for Response  | Per Archroma Product Stewardship no reportable PFAS were imported or produced. |
| Decane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8-heptadecafluoro-10-iodo-                           | Other  |
| Reason for Response  | Per Archroma Product Stewardship no reportable PFAS were imported or produced. |
| Dodecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10-heneicosafluoro-12-iodo-               | Other  |
| Reason for Response  | Per Archroma Product Stewardship no reportable PFAS were imported or produced. |
| Tetradecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12-pentacosafuoro-14-iodo- | Other  |
| Reason for Response  | Per Archroma Product Stewardship no reportable PFAS were imported or produced. |

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# US MARINE CORPS MCAS BEAUFORT STATION (STATION) (29904SDDMCHWY21)

HWY 21 BLDG 601 GEIGER BLVD, BEAUFORT, SC 29904 (Region 4)

## EPA Email – OG-1

Region 4 Email

03/15/2022 07:54am

From: *Ezequiel Velez*

Subject: Toxics Release Inventory (TRI) Data Quality Questions - Due April 15, 2022

| Sent To            | E-Mail Address                |
|--------------------|-------------------------------|
| To: CHRIS VAIGNEUR | CHRISTOPHER.VAIGNEUR@USMC.MIL |
| To: RYAN DUNN      | RYAN.M.DUNN@USMC.MIL          |

Attachments:

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Toxics Release Inventory (TRI) Data Quality Questions [(US MARINE CORPS MCAS BEAUFORT STATION (STATION)) (TRIFID: 29904SDDMCHWY21)] Form R for Reporting Year(s) 2020 - Due April 15, 2022**

Tue Mar 15 11:54:02 EDT 2022

Dear RYAN DUNN and CHRIS VAIGNEUR:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: *US MARINE CORPS MCAS BEAUFORT STATION (STATION)) - (TRIFID: 29904SDDMCHWY21)* for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 6 hazardous waste shipments (some e-Manifest #: 6) totaling 113,374 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=57b3d294-d5f7-46ed-ab4b-a09290d9ef90&target=ca3428b3-29c2-4a36-931d-3002c2c6aed1>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 15, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Ezequiel Velez at [velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

TRI Coordinator

US EPA Region 4

UST & Data Management Section

61 Forsyth, St. S.W.

Atlanta, GA 30303

Tel. (404) 562-9191

[velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov)

[www.epa.gov/tri](http://www.epa.gov/tri)

## EPA Email – OG-2

Region 4 Email

03/21/2022 11:19am

From: *Ezequiel Velez*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To            | E-Mail Address                |
|--------------------|-------------------------------|
| To: CHRIS VAIGNEUR | CHRISTOPHER.VAIGNEUR@USMC.MIL |
| To: RYAN DUNN      | RYAN.M.DUNN@USMC.MIL          |

Attachments:

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 4

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

Mon Mar 21 15:19:29 EDT 2022

Dear RYAN DUNN and CHRIS VAIGNEUR:

EPA would like to inform you that data quality issues raised for your facility [US MARINE CORPS MCAS BEAUFORT STATION (STATION) (TRIFID: 29904SDDMCHWY21)] during reporting year 2020 Adhoc Data Quality Checks are resolved for the following:

#### Reporting Year(s) Chemicals

2020 No chemicals

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Ezequiel Velez

TRI Data Quality Program

US EPA

Region 4

Email sent on 03/18/2022 07:18am

US MARINE CORPS MCAS BEAUFORT STATION (STATION) - 29904SDDMCHWY21 submitted a web response on Mar 18, 2022 11:18:39 AM. A PDF copy of the web response is attached.

### Facility Response – IC-1

Subject: Facility Response Form

Mar 18, 2022 11:18:39 AM

From: Ryan Dunn

(843) 228-6055

ryan.m.dunn@usmc.mil

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

PFAS-NOT-F RY 2020

The source of these releases and quantities are listed below:

| Response            |  | Reporting Year<br>(if applicable) |
|---------------------|--|-----------------------------------|
| No Change           |  |                                   |
| Reason for Response | Based on sampling of these hazardous waste shipments, the total amount for each PFAS chemical did not exceed 100 lbs in RY2020 for the installation, therefore no Form Rs were submitted. MCAS Beaufort continues to track this for future reporting years and will report if any chemical exceeds the applicable threshold. Let us know if you have any additional questions. |                                   |

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**INNOVATIVE CHEMICAL TECHNOLOGIES  
INC (30120CLRKC103WA)  
103 WALNUT GROVE RD, CARTERSVILLE, GA 30120 (Region 4)**

**EPA Email – OG-1**

Region 4 Email

07/26/2021 06:21am

From: *Ezequiel Velez*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(INNOVATIVE CHEMICAL TECHNOLOGIES INC) (TRIFID: 30120CLRKC103WA)] for RY 2020 - Due September 10, 2021

| Sent To              | E-Mail Address           |
|----------------------|--------------------------|
| To: DENNIS S. THAYER | DENNIST@ICTCHEMICALS.COM |
| To: DENNIS S. THAYER | DENNIST@ICTCHEMICALS.COM |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Toxics Release Inventory (TRI) Data Quality Questions [(INNOVATIVE CHEMICAL TECHNOLOGIES INC) (TRIFID: 30120CLRKC103WA)] Form A and Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Mon Jul 26 10:20:53 EDT 2021

Dear DENNIS S. THAYER:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form A and Form R for 2-Propenoic acid, 2-methyl-, octadecyl ester, polymer with 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafuorododecyl 2-propenoate, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluorodecyl 2-propenoate and 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,14-pentacosafuorotetradecyl 2-propenoate, Alcohols, C8-14, γ-ω-perfluoro, Ethanol, 2,2'-iminobis-, compd. with α,α'-[phosphinicobis(oxy-2,1-ethanediyl)]bis[ω-fluoropoly(difluoromethylene)] (1:1), Ethanol, 2,2'-iminobis-, compd. with α-fluoro-ω-[2-(phosphonoxy)ethyl]poly(difluoromethylene) (2:1), Phosphinic acid, bis(perfluoro-C6-12-alkyl) derivs.,**

**Phosphonic acid, perfluoro-C6-12-alkyl derivs., Poly(difluoromethylene),  $\alpha,\alpha'$ -[phosphinicobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoro-, Poly(difluoromethylene),  $\alpha,\alpha'$ -[phosphinicobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoro-, ammonium salt, Poly(difluoromethylene),  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]-, Poly(difluoromethylene),  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]-, diammonium salt and Poly(oxy-1,2-ethanediyl),  $\alpha$ -hydro- $\omega$ -hydroxy-, ether with  $\alpha$ -fluoro- $\omega$ -(2-hydroxyethyl)poly(difluoromethylene) (1:1) submitted to EPA from your facility [(Name: INNOVATIVE CHEMICAL TECHNOLOGIES INC) - (TRIFID: 30120CLRKC103WA)] for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for 2-Propenoic acid, 2-methyl-, octadecyl ester, polymer with 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafuorododecyl 2-propenoate, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluorodecyl 2-propenoate and 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,14-pentacosafuorotetradecyl 2-propenoate to TRI for reporting year 2020, but might have reported this chemical, 2-Propenoic acid, 2-methyl-, octadecyl ester, polymer with 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafuorododecyl 2-propenoate, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluorodecyl 2-propenoate and 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,14-pentacosafuorotetradecyl 2-propenoate to 2016 CDR as manufactured / imported. Please review and submit new report for 2-Propenoic acid, 2-methyl-, octadecyl ester, polymer with 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafuorododecyl 2-propenoate, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluorodecyl 2-propenoate and 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,14-pentacosafuorotetradecyl 2-propenoate for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Ethanol, 2,2'-iminobis-, compd. with  $\alpha,\alpha'$ -[phosphinicobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoropoly(difluoromethylene)] (1:1) to TRI for reporting year 2020, but might have reported this chemical, Ethanol, 2,2'-iminobis-, compd. with  $\alpha,\alpha'$ -[phosphinicobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoropoly(difluoromethylene)] (1:1) to 2016 CDR as manufactured / imported. Please review and submit new report for Ethanol, 2,2'-iminobis-, compd. with  $\alpha,\alpha'$ -[phosphinicobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoropoly(difluoromethylene)] (1:1) for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (2:1) to TRI for reporting year 2020, but might have reported this chemical, Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (2:1) to 2016 CDR as manufactured / imported. Please review and submit new report for Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (2:1) for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)

cbi\_pfas\_list\_1\_8\_2021\_final.pdf) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Phosphonic acid, perfluoro-C6-12-alkyl derivs. to TRI for reporting year 2020, but might have reported this chemical, Phosphonic acid, perfluoro-C6-12-alkyl derivs. to 2016 CDR as manufactured / imported. Please review and submit new report for Phosphonic acid, perfluoro-C6-12-alkyl derivs. for reporting year 2020, if required.

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Alcohols, C8-14, γ-ω-perfluoro to TRI for reporting year 2020, but might have reported this chemical, Alcohols, C8-14, γ-ω-perfluoro to 2016 CDR as manufactured / imported. Please review and submit new report for Alcohols, C8-14, γ-ω-perfluoro for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Poly(difluoromethylene), α,α'-[phosphinicobis(oxy-2,1-ethanediyl)]bis[ω-fluoro- to TRI for reporting year 2020, but might have reported this chemical, Poly(difluoromethylene), α,α'-[phosphinicobis(oxy-2,1-ethanediyl)]bis[ω-fluoro- to 2016 CDR as manufactured / imported. Please review and submit new report for Poly(difluoromethylene), α,α'-[phosphinicobis(oxy-2,1-ethanediyl)]bis[ω-fluoro- for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Poly(difluoromethylene), α-fluoro-ω-[2-(phosphonooxy)ethyl]- to TRI for reporting year 2020, but might have reported this chemical, Poly(difluoromethylene), α-fluoro-ω-[2-(phosphonooxy)ethyl]- to 2016 CDR as manufactured / imported. Please review and submit new report for Poly(difluoromethylene), α-fluoro-ω-[2-(phosphonooxy)ethyl]- for reporting year 2020, if required.
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submit new report for Poly(oxy-1,2-ethanediyl),  $\alpha$ -hydro- $\omega$ -hydroxy-, ether with  $\alpha$ -fluoro- $\omega$ -(2-hydroxyethyl)poly(difluoromethylene) (1:1) for reporting year 2020, if required.

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#### ***How do I respond to this inquiry?***

##### ***Step 1:***

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=d356368c-d2dc-40c0-b8bf-837042cff92&target=f6a075dd-a261-4d50-8897-33740f2963b1>

***If you indicate new submission, revision or withdrawal in web response questionnaire, please proceed to step 2.***

##### ***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you would like to make any revisions, withdrawals or new submissions, **please send them to EPA by September 10, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have any follow up questions, please contact Ezequiel Velez at (404) 562-9191 or email at [velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

## **EPA Email – OG-2**

Region 4 Email

08/19/2021 06:03am

From: *Ezequiel Velez*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(INNOVATIVE CHEMICAL TECHNOLOGIES INC) (TRIFID: 30120CLRKC103WA)] Form A and Form R for Reporting Year(s) 2020 - Due September 10, 2021

| Sent To              | E-Mail Address           |
|----------------------|--------------------------|
| To: DENNIS S. THAYER | DENNIST@ICTCHEMICALS.COM |
| To: DENNIS S. THAYER | DENNIST@ICTCHEMICALS.COM |

Attachments:

**Questions for Your Facility [(INNOVATIVE CHEMICAL TECHNOLOGIES INC) (TRIFID: 30120CLRKC103WA)]  
Regarding Toxics Release Inventory (TRI) Submissions - Due September 10, 2021**

Dear DENNIS S THAYER:

This email is an reminder to EPA email(s) dated July 25, 2021 about data quality questions for your facility for reporting year(s) 2020. EPA has NOT received your web response yet. ***Please send your web response ASAP.***

### **How do I respond to this inquiry?**

#### **Step 1:**

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=fea81187-068b-4297-98a1-0d8e8ee57121&target=f6a075dd-a261-4d50-8897-33740f2963b1>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

#### **Step 2:**

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by September 10, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Ezequiel Velez at [velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Toxics Release Inventory (TRI) Data Quality Questions [(INNOVATIVE CHEMICAL TECHNOLOGIES INC) (TRIFID: 30120CLRKC103WA)] Form A and Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Mon Jul 26 10:20:53 EDT 2021

Dear DENNIS S. THAYER:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form A and Form R for 2-Propenoic acid, 2-methyl-, octadecyl ester, polymer with 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafuorododecyl 2-propenoate, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluorodecyl 2-propenoate and 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,14-pentacosafuorotetradecyl 2-propenoate, Alcohols,**

C8-14,  $\gamma$ - $\omega$ -perfluoro, Ethanol, 2,2'-iminobis-, compd. with  $\alpha,\alpha'$ -[phosphinobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoropoly(difluoromethylene)] (1:1), Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (2:1), Phosphinic acid, bis(perfluoro-C6-12-alkyl) derivs., Phosphonic acid, perfluoro-C6-12-alkyl derivs., Poly(difluoromethylene),  $\alpha,\alpha'$ -[phosphinobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoro-, Poly(difluoromethylene),  $\alpha,\alpha'$ -[phosphinobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoro-, ammonium salt, Poly(difluoromethylene),  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]-, Poly(difluoromethylene),  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]-, diammonium salt and Poly(oxy-1,2-ethanediyl),  $\alpha$ -hydro- $\omega$ -hydroxy-, ether with  $\alpha$ -fluoro- $\omega$ -(2-hydroxyethyl)poly(difluoromethylene) (1:1) submitted to EPA from your facility [(Name: **INNOVATIVE CHEMICAL TECHNOLOGIES INC**) - (TRIFID: 30120CLRKC103WA)] for reporting year(s) 2020 has been identified for follow-up due to the following:

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for 2-Propenoic acid, 2-methyl-, octadecyl ester, polymer with 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafluorododecyl 2-propenoate, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluorodecyl 2-propenoate and 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,14-pentacosafuorotetradecyl 2-propenoate to TRI for reporting year 2020, but might have reported this chemical, 2-Propenoic acid, 2-methyl-, octadecyl ester, polymer with 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafluorododecyl 2-propenoate, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluorodecyl 2-propenoate and 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,14-pentacosafuorotetradecyl 2-propenoate to 2016 CDR as manufactured / imported. Please review and submit new report for 2-Propenoic acid, 2-methyl-, octadecyl ester, polymer with 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafluorododecyl 2-propenoate, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluorodecyl 2-propenoate and 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,14-pentacosafuorotetradecyl 2-propenoate for reporting year 2020, if required.
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- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Poly(difluoromethylene),  $\alpha,\alpha'$ -[phosphinicobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoro- to TRI for reporting year 2020, but might have reported this chemical, Poly(difluoromethylene),  $\alpha,\alpha'$ -[phosphinicobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoro- to 2016 CDR as manufactured / imported. Please review and submit new report for Poly(difluoromethylene),  $\alpha,\alpha'$ -[phosphinicobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoro- for reporting year 2020, if required.
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hydroxyethyl)poly(difluoromethylene) (1:1) to TRI for reporting year 2020, but might have reported this chemical, Poly(oxy-1,2-ethanediyl),  $\alpha$ -hydro- $\omega$ -hydroxy-, ether with  $\alpha$ -fluoro- $\omega$ -(2-hydroxyethyl)poly(difluoromethylene) (1:1) to 2016 CDR as manufactured / imported. Please review and submit new report for Poly(oxy-1,2-ethanediyl),  $\alpha$ -hydro- $\omega$ -hydroxy-, ether with  $\alpha$ -fluoro- $\omega$ -(2-hydroxyethyl)poly(difluoromethylene) (1:1) for reporting year 2020, if required.

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### ***How do I respond to this inquiry?***

#### ***Step 1:***

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=d356368c-d2dc-40c0-b8bf-83704f2cff92&target=f6a075dd-a261-4d50-8897-33740f2963b1>

***If you indicate new submission, revision or withdrawal in web response questionnaire, please proceed to step 2.***

#### ***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you would like to make any revisions, withdrawals or new submissions, **please send them to EPA by September 10, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have any follow up questions, please contact Ezequiel Velez at (404) 562-9191 or email at [velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

### EPA Email – OG-3

Region 4 Email

08/26/2021 04:17am

From: *Ezequiel Velez*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To              | E-Mail Address           |
|----------------------|--------------------------|
| To: DENNIS S. THAYER | DENNIST@ICTCHEMICALS.COM |
| To: DENNIS S. THAYER | DENNIST@ICTCHEMICALS.COM |

Attachments:

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 4

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

Thu Aug 26 08:17:47 EDT 2021

Dear DENNIS S THAYER:

EPA would like to inform you that data quality issues raised for your facility [INNOVATIVE CHEMICAL TECHNOLOGIES INC (TRIFID: 30120CLRKC103WA)] during reporting year 2020 Adhoc Data Quality Checks cycle are resolved for the following:

#### Reporting Year(s) Chemicals

2020 2-Propenoic acid, 2-methyl-, octadecyl ester, polymer with 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafluorododecyl 2-propenoate, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluorodecyl 2-propenoate and 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,14-pentacosafuorotetradecyl 2-propenoate, Alcohols, C8-14, γ-ω-perfluoro, Ethanol, 2,2'-iminobis-, compd. with α,α'-[phosphinicobis(oxy-2,1-ethanediyl)]bis[ω-fluoropoly(difluoromethylene)] (1:1), Ethanol, 2,2'-iminobis-, compd. with α-fluoro-ω-[2-(phosphonooxy)ethyl]poly(difluoromethylene) (2:1), Phosphonic acid, bis(perfluoro-C6-12-alkyl) derivs., Phosphonic acid, perfluoro-C6-12-alkyl derivs., Poly(difluoromethylene), α,α'-[phosphinicobis(oxy-2,1-ethanediyl)]bis[ω-fluoro-, Poly(difluoromethylene), α,α'-[phosphinicobis(oxy-2,1-ethanediyl)]bis[ω-fluoro-, ammonium salt,

Poly(difluoromethylene),  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]-, Poly(difluoromethylene),  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]-, diammonium salt and Poly(oxy-1,2-ethanediyl),  $\alpha$ -hydro- $\omega$ -hydroxy-, ether with  $\alpha$ -fluoro- $\omega$ -(2-hydroxyethyl)poly(difluoromethylene) (1:1)

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Ezequiel Velez

TRI Data Quality Program

US EPA

Region 4

**Email sent on 08/26/2021 08:14am**

INNOVATIVE CHEMICAL TECHNOLOGIES INC - 30120CLRKC103WA submitted a web response on Aug 26, 2021 8:13:31 AM. A PDF copy of the web response is attached.

### Facility Response – IC-1

Subject: Facility Response Form

From: Dennis Scott thayer

Aug 26, 2021 8:13:31 AM

(167) 872-15434  
dennist@ictchemicals.com

Contractor Company Name: Innovative Chemical Technologies, Inc.

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

PFAS-NOT RY 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for 2-Propenoic acid, 2-methyl-, octadecyl ester, polymer with 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafuorododecyl 2-propenoate, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluorodecyl 2-propenoate and 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,14-pentacosafuorotetradecyl 2-propenoate to TRI for reporting year 2020, but might have reported this chemical, 2-Propenoic acid, 2-methyl-, octadecyl ester, polymer with 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafuorododecyl 2-propenoate, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluorodecyl 2-propenoate and 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,14-pentacosafuorotetradecyl 2-propenoate to 2016 CDR as manufactured / imported. Please review and submit new report for 2-Propenoic acid, 2-

methyl-, octadecyl ester, polymer with 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafuorododecyl 2-propenoate, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluorodecyl 2-propenoate and 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,14-pentacosafuorotetradecyl 2-propenoate for reporting year 2020, if required.

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Alcohols, C8-14,  $\gamma$ - $\omega$ -perfluoro to TRI for reporting year 2020, but might have reported this chemical, Alcohols, C8-14,  $\gamma$ - $\omega$ -perfluoro to 2016 CDR as manufactured / imported. Please review and submit new report for Alcohols, C8-14,  $\gamma$ - $\omega$ -perfluoro for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Ethanol, 2,2'-iminobis-, compd. with  $\alpha,\alpha'$ -[phosphinobis(oxy-2,1-ethanediyl)]bis( $\omega$ -fluoropoly(difluoromethylene)] (1:1) to TRI for reporting year 2020, but might have reported this chemical, Ethanol, 2,2'-iminobis-, compd. with  $\alpha,\alpha'$ -[phosphinobis(oxy-2,1-ethanediyl)]bis( $\omega$ -fluoropoly(difluoromethylene)] (1:1) to 2016 CDR as manufactured / imported. Please review and submit new report for Ethanol, 2,2'-iminobis-, compd. with  $\alpha,\alpha'$ -[phosphinobis(oxy-2,1-ethanediyl)]bis( $\omega$ -fluoropoly(difluoromethylene)] (1:1) for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (2:1) to TRI for reporting year 2020, but might have reported this chemical, Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (2:1) to 2016 CDR as manufactured / imported. Please review and submit new report for Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (2:1) for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Phosphinic acid, bis(perfluoro-C6-12-alkyl) derivs. to TRI for reporting year 2020, but might have reported this chemical, Phosphinic acid, bis(perfluoro-C6-12-alkyl) derivs. to 2016 CDR as manufactured / imported. Please review and submit new report for Phosphinic acid, bis(perfluoro-C6-12-alkyl) derivs. for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Phosphonic acid, perfluoro-C6-12-alkyl derivs. to TRI for reporting year 2020, but might have reported this chemical, Phosphonic acid, perfluoro-C6-12-alkyl derivs. to 2016 CDR as manufactured / imported. Please review and submit new report for Phosphonic acid, perfluoro-C6-12-alkyl derivs. for reporting year 2020, if required.

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Poly(difluoromethylene),  $\alpha,\alpha'$ -[phosphinicobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoro- to TRI for reporting year 2020, but might have reported this chemical, Poly(difluoromethylene),  $\alpha,\alpha'$ -[phosphinicobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoro- to 2016 CDR as manufactured / imported. Please review and submit new report for Poly(difluoromethylene),  $\alpha,\alpha'$ -[phosphinicobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoro- for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Poly(difluoromethylene),  $\alpha,\alpha'$ -[phosphinicobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoro-, ammonium salt to TRI for reporting year 2020, but might have reported this chemical, Poly(difluoromethylene),  $\alpha,\alpha'$ -[phosphinicobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoro-, ammonium salt to 2016 CDR as manufactured / imported. Please review and submit new report for Poly(difluoromethylene),  $\alpha,\alpha'$ -[phosphinicobis(oxy-2,1-ethanediyl)]bis[ $\omega$ -fluoro-, ammonium salt for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Poly(difluoromethylene),  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]- to TRI for reporting year 2020, but might have reported this chemical, Poly(difluoromethylene),  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]- to 2016 CDR as manufactured / imported. Please review and submit new report for Poly(difluoromethylene),  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]- for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Poly(difluoromethylene),  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]-, diammonium salt to TRI for reporting year 2020, but might have reported this chemical, Poly(difluoromethylene),  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]-, diammonium salt to 2016 CDR as manufactured / imported. Please review and submit new report for Poly(difluoromethylene),  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]-, diammonium salt for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Poly(oxy-1,2-ethanediyl),  $\alpha$ -hydro- $\omega$ -hydroxy-, ether with  $\alpha$ -fluoro- $\omega$ -(2-hydroxyethyl)poly(difluoromethylene) (1:1) to TRI for reporting year 2020, but might have reported this chemical, Poly(oxy-1,2-ethanediyl),  $\alpha$ -hydro- $\omega$ -hydroxy-, ether with  $\alpha$ -fluoro- $\omega$ -(2-hydroxyethyl)poly(difluoromethylene) (1:1) to 2016 CDR as manufactured / imported. Please review and submit new report for Poly(oxy-1,2-ethanediyl),  $\alpha$ -hydro- $\omega$ -hydroxy-, ether with  $\alpha$ -fluoro- $\omega$ -(2-hydroxyethyl)poly(difluoromethylene) (1:1) for reporting year 2020, if required.

The source of these releases and quantities are listed below:

| Reported Chemical   | Reporting Year (if Response applicable) |
|---|---|
| 2-Propenoic acid, 2-methyl-, octadecyl ester, polymer with 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafuorododecyl 2-propenoate, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluorododecyl 2-propenoate and 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,13,13,14,14,14-pentacosafuorotetradecyl 2-propenoate | No Change                               |
| Reason for Response   | Trade Secrecy has been filed            |
| Alcohols, C8-14, γ-ω-perfluoro  | No Change                               |
| Reason for Response   | Trade Secrecy has been filed            |
| Ethanol, 2,2'-iminobis-, compd. with α,α'-[phosphinicobis(oxy-2,1-ethanediyl)]bis[ω-fluoropoly(difluoromethylene)] (1:1)  | No Change                               |
| Reason for Response   | Trade Secrecy has been filed            |
| Ethanol, 2,2'-iminobis-, compd. with α-fluoro-ω-[2-(phosphonooxy)ethyl]poly(difluoromethylene) (2:1)  | No Change                               |
| Reason for Response   | Trade Secrecy has been filed            |
| Phosphinic acid, bis(perfluoro-C6-12-alkyl) derivs.   | No Change                               |
| Reason for Response   | Trade Secrecy has been filed            |
| Phosphonic acid, perfluoro-C6-12-alkyl derivs.  | No Change                               |
| Reason for Response   | Trade Secrecy has been filed            |
| Poly(difluoromethylene), α,α'-[phosphinicobis(oxy-2,1-ethanediyl)]bis[ω-fluoro-   | No Change                               |
| Reason for Response   | Trade Secrecy has been filed            |
| Poly(difluoromethylene), α,α'-[phosphinicobis(oxy-2,1-ethanediyl)]bis[ω-fluoro-, ammonium salt  | No Change                               |
| Reason for Response   | Trade Secrecy has been filed            |
| Poly(difluoromethylene), α-fluoro-ω-[2-(phosphonooxy)ethyl]-  | No Change                               |
| Reason for Response   | Trade Secrecy has been filed            |
| Poly(difluoromethylene), α-fluoro-ω-[2-(phosphonooxy)ethyl]-, diammonium salt   | No Change                               |
| Reason for Response   | Trade Secrecy has been filed            |
| Poly(oxy-1,2-ethanediyl), α-hydro-ω-hydroxy-, ether with α-fluoro-ω-(2-hydroxyethyl)poly(difluoromethylene) (1:1)   | No Change                               |
| Reason for Response   | Trade Secrecy has been filed            |

.....

# POLYVENTIVE - ROME (30161PCHST180BU) 180 BURLINGTON RD, ROME, GA 30161 (Region 4)

## EPA Email – OG-1

Region 4 Email

07/26/2021 06:33am

From: *Ezequiel Velez*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(POLYVENTIVE - ROME) (TRIFID: 30161PCHST180BU)] for RY 2020 - Due September 10, 2021

| Sent To            | E-Mail Address           |
|--------------------|--------------------------|
| To: THOMAS ZACHARY | TZACHARY@POLYVENTIVE.COM |
| To: THOMAS ZACHARY | TZACHARY@POLYVENTIVE.COM |

Attachments:

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

#### Toxics Release Inventory (TRI) Data Quality Questions [(POLYVENTIVE - ROME) (TRIFID: 30161PCHST180BU)] Form A and Form R for Reporting Year(s) 2020 - Due September 10, 2021

Mon Jul 26 10:33:13 EDT 2021

Dear THOMAS ZACHARY:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form A and Form R for Alkyl iodides, C4-20, γ-ω-perfluoro submitted to EPA from your facility [(Name: POLYVENTIVE - ROME) - (TRIFID: 30161PCHST180BU)] for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-)

cbi\_pfas\_list\_1\_8\_2021\_final.pdf) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Alkyl iodides, C4-20, γ-ω-perfluoro to TRI for reporting year 2020, but might have reported this chemical, Alkyl iodides, C4-20, γ-ω-perfluoro to 2016 CDR as manufactured / imported. Please review and submit new report for Alkyl iodides, C4-20, γ-ω-perfluoro for reporting year 2020, if required.

***How do I respond to this inquiry?***

***Step 1:***

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=bf3b4d2c-4e1c-46ba-8018-bd17358f9534&target=59a27fe9-8401-4ee9-847b-fbf2a6573df4>

***If you indicate new submission, revision or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you would like to make any revisions, withdrawals or new submissions, **please send them to EPA by September 10, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have any follow up questions, please contact Ezequiel Velez at (404) 562-9191 or email at [velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**EPA Email – OG-2**

Region 4 Email

08/19/2021 06:07am

From: Ezequiel Velez

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(POLYVENTIVE - ROME) (TRIFID: 30161PCHST180BU)] Form A and Form R for Reporting Year(s) 2020 - Due September 10, 2021

| Sent To            | E-Mail Address           |
|--------------------|--------------------------|
| To: THOMAS ZACHARY | TZACHARY@POLYVENTIVE.COM |
| To: THOMAS ZACHARY | TZACHARY@POLYVENTIVE.COM |

Attachments:

**Questions for Your Facility [(POLYVENTIVE - ROME) (TRIFID: 30161PCHST180BU)] Regarding Toxics Release Inventory (TRI) Submissions - Due September 10, 2021**

Dear THOMAS ZACHARY:

This email is a reminder to EPA email(s) dated July 25, 2021 about data quality questions for your facility for reporting year(s) 2020. EPA has NOT received your web response yet. ***Please send your web response ASAP.***

**How do I respond to this inquiry?**

**Step 1:**

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=376fc876-e80b-40ab-b6f4-849f98ec0f75&target=59a27fe9-8401-4ee9-847b-fbf2a6573df4>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

**Step 2:**

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If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by September 10, 2021.**

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If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Ezequiel Velez at [velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Email sent on 07/26/2021 10:33am**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Toxics Release Inventory (TRI) Data Quality Questions [(POLYVENTIVE - ROME) (TRIFID: 30161PCHST180BU)]  
Form A and Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Mon Jul 26 10:33:13 EDT 2021

Dear THOMAS ZACHARY:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form A and Form R for Alkyl iodides, C4-20, γ-ω-perfluoro submitted to EPA from your facility [(Name: POLYVENTIVE - ROME) - (TRIFID: 30161PCHST180BU)] for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Alkyl iodides, C4-20, γ-ω-perfluoro to TRI for reporting year 2020, but might have reported this chemical, Alkyl iodides, C4-20, γ-ω-perfluoro to 2016 CDR as manufactured / imported. Please review and submit new report for Alkyl iodides, C4-20, γ-ω-perfluoro for reporting year 2020, if required.

***How do I respond to this inquiry?***

*Step 1:*

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=bf3b4d2c-4e1c-46ba-8018-bd17358f9534&target=59a27fe9-8401-4ee9-847b-fbf2a6573df4>

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Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

### **EPA Email – OG-3**

Region 4 Email

08/19/2021 06:58am

From: *Ezequiel Velez*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To            | E-Mail Address           |
|--------------------|--------------------------|
| To: THOMAS ZACHARY | TZACHARY@POLYVENTIVE.COM |
| To: THOMAS ZACHARY | TZACHARY@POLYVENTIVE.COM |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Region 4

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

Thu Aug 19 10:58:28 EDT 2021

Dear THOMAS ZACHARY:

EPA would like to inform you that data quality issues raised for your facility [POLYVENTIVE - ROME (TRIFID: 30161PCHST180BU)] during reporting year 2020 Adhoc Data Quality Checks cycle are resolved for the following:

Reporting Year(s) Chemicals

2020 Alkyl iodides, C4-20, γ-ω-perfluoro

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Ezequiel Velez

TRI Data Quality Program

US EPA

Region 4

**Email sent on 08/19/2021 10:07am**

**Questions for Your Facility [(POLYVENTIVE - ROME) (TRIFID: 30161PCHST180BU)] Regarding Toxics Release Inventory (TRI) Submissions - Due September 10, 2021**

Dear THOMAS ZACHARY:

This email is a reminder to EPA email(s) dated July 25, 2021 about data quality questions for your facility for reporting year(s) 2020. EPA has NOT received your web response yet. ***Please send your web response ASAP.***

**How do I respond to this inquiry?**

**Step 1:**

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=376fc876-e80b-40ab-b6f4-849f98ec0f75&target=59a27fe9-8401-4ee9-847b-fbf2a6573df4>

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Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Email sent on 07/26/2021 10:33am**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Toxics Release Inventory (TRI) Data Quality Questions [(POLYVENTIVE - ROME) (TRIFID: 30161PCHST180BU)]  
Form A and Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Mon Jul 26 10:33:13 EDT 2021

Dear THOMAS ZACHARY:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

The Form A and Form R for Alkyl iodides, C4-20, γ-ω-perfluoro submitted to EPA from your facility [(Name: POLYVENTIVE - ROME) - (TRIFID: 30161PCHST180BU)] for reporting year(s) 2020 has been identified for follow-up due to the following:

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- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Alkyl iodides, C4-20, γ-ω-perfluoro to TRI for reporting year 2020, but might have reported this chemical, Alkyl iodides, C4-20, γ-ω-perfluoro to 2016 CDR as manufactured / imported. Please review and submit new report for Alkyl iodides, C4-20, γ-ω-perfluoro for reporting year 2020, if required.

***How do I respond to this inquiry?***

*Step 1:*

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=bf3b4d2c-4e1c-46ba-8018-bd17358f9534&target=59a27fe9-8401-4ee9-847b-fbf2a6573df4>

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If you would like to make any revisions, withdrawals or new submissions, **please send them to EPA by September 10, 2021.**

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Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Facility Response – IC-1**

Subject: Facility Response Form

Aug 19, 2021 10:56:28 AM

From: Austin Smith

(706) 659-0300

Asmith@polyventive.com

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

PFAS-NOT RY 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Alkyl iodides, C4-20, γ-ω-perfluoro to TRI for reporting year 2020, but might have reported this chemical, Alkyl iodides, C4-20, γ-ω-perfluoro to 2016 CDR as manufactured / imported. Please review and submit new report for Alkyl iodides, C4-20, γ-ω-perfluoro for reporting year 2020, if required.

The source of these releases and quantities are listed below:

| Reported Chemical                   | Response   | Reporting Year<br>(if applicable) |
|-------------------------------------|--|-----------------------------------|
| Alkyl iodides, C4-20, γ-ω-perfluoro | No Change  |                                   |
| Reason for Response                 | This chemical was not manufactured/imported for this facility in 2020. |                                   |

.....

**U.S. NAVY NAVAL AIR STATION WHITING  
FIELD (3257WSNVYN7183L)  
7183 LANGLEY ST BUILDING 1416, MILTON, FL 32570 (Region 4)**

**EPA Email – OG-1**

Region 4 Email

03/15/2022 07:51am

From: *Ezequiel Velez*

Subject: Toxics Release Inventory (TRI) Data Quality Questions - Due April 15, 2022

| Sent To              | E-Mail Address              |
|----------------------|-----------------------------|
| To: JONATHAN STEWART | JONATHAN.A.STEWART@NAVY.MIL |
| To: JONATHAN STEWART | JONATHAN.A.STEWART@NAVY.MIL |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Toxics Release Inventory (TRI) Data Quality Questions [(U.S. NAVY NAVAL AIR STATION WHITING FIELD) (TRIFID: 3257WSNVYN7183L)] Form R for Reporting Year(s) 2020 - Due April 15, 2022**

Tue Mar 15 11:51:29 EDT 2022

Dear JONATHAN STEWART:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: U.S. NAVY NAVAL AIR STATION WHITING FIELD) - (TRIFID: 3257WSNVYN7183L) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-)

cbi\_pfas\_list\_1\_8\_2021\_final.pdf) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 3 hazardous waste shipments (some e-Manifest #: 3) totaling 31,102 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=6bddd2be-3e84-42da-a060-39238af65624&target=66a1857f-4b52-4c64-b983-a015894f478c>

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Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

TRI Coordinator

US EPA Region 4

UST & Data Management Section

61 Forsyth, St. S.W.

Atlanta, GA 30303

Tel. (404) 562-9191

[velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov)

[www.epa.gov/tri](http://www.epa.gov/tri)

## EPA Email – OG-2

Region 4 Email

04/12/2022 09:00am

From: *Ezequiel Velez*

Subject: Toxics Release Inventory (TRI) Data Quality Questions - Due April 29, 2022

| Sent To              | E-Mail Address              |
|----------------------|-----------------------------|
| To: JONATHAN STEWART | JONATHAN.A.STEWART@NAVY.MIL |
| To: JONATHAN STEWART | JONATHAN.A.STEWART@NAVY.MIL |

Attachments:

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Toxics Release Inventory (TRI) Data Quality Questions [(U.S. NAVY NAVAL AIR STATION WHITING FIELD) (TRIFID: 3257WSNVYN7183L)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Apr 12 13:00:20 UTC 2022

Dear JONATHAN STEWART:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

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Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

TRI Coordinator

US EPA Region 4

UST & Data Management Section

61 Forsyth, St. S.W.

Atlanta, GA 30303

Tel. (404) 562-9191

[velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov)

[www.epa.gov/tri](http://www.epa.gov/tri)

**Email sent on 03/15/2022 11:51am**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Toxics Release Inventory (TRI) Data Quality Questions [(U.S. NAVY NAVAL AIR STATION WHITING FIELD) (TRIFID: 3257WSNVYN7183L)] Form R for Reporting Year(s) 2020 - Due April 15, 2022**

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Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

TRI Coordinator

US EPA Region 4

UST & Data Management Section

61 Forsyth, St. S.W.

Atlanta, GA 30303

Tel. (404) 562-9191

[velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov)

[www.epa.gov/tri](http://www.epa.gov/tri)

**EPA Email – OG-3**

Region 4 Email

04/18/2022 08:15am

From: *Ezequiel Velez*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To              | E-Mail Address              |
|----------------------|-----------------------------|
| To: JONATHAN STEWART | JONATHAN.A.STEWART@NAVY.MIL |
| To: JONATHAN STEWART | JONATHAN.A.STEWART@NAVY.MIL |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Region 4

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

Mon Apr 18 12:15:41 UTC 2022

Dear JONATHAN STEWART:

EPA would like to inform you that data quality issues raised for your facility [U.S. NAVY NAVAL AIR STATION WHITING FIELD (TRIFID: 3257WSNVYN7183L)] during reporting year 2020 Adhoc Data Quality Checks are resolved for the following:

Reporting Year(s) Chemicals

2020 No chemicals

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Ezequiel Velez

TRI Data Quality Program

US EPA

Region 4

**Email sent on 04/15/2022 02:44pm**

U.S. NAVY NAVAL AIR STATION WHITING FIELD - 3257WSNVYN7183L submitted a web response on Apr 15, 2022 2:43:52 PM. A PDF copy of the web response is attached.

### Facility Response – IC-1

Subject: Facility Response Form

Apr 15, 2022 2:43:52 PM

From: Jacquelin Brooke Boyd

(850) 554-6676 jacquelin.b.boyd.civ@us.navy.mil

Contractor Company Name: DoD US Navy

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

PFAS-NOT-F RY 2020

The source of these releases and quantities are listed below:

| Response            | Reporting Year<br>(if applicable)  |
|---------------------|--|
| No Change           |  |
| Reason for Response | b. Reason for Response: We evaluated EPCRA Section 313 activities and reviewed materials used at the facility from RY 2020 and determined that there was no identified usage of PFAS compounds. Waste transfers from RY 2020 were also evaluated to determine any additional pathways which should be included in the TRI threshold evaluation for RY 2020. Based on EPCRA Section 313 Industry Guidance Chemical Distribution Facilities (January 1999) (EPA 745-B-99-005), waste that is transferred off-site for treatment, disposal, or energy recovery is not considered repackaged or distributed in commerce and is therefore not considered processed. Based on tracking manifests from the facility of AFFF that potentially contained PFAS, the AFFF that was removed during CY 2020 was shipped off-site for either disposal or energy recovery. Therefore, the AFFF removed during CY 2020 was not considered processed, and the individual PFAS EPCRA Section 313 reporting threshold was not applicable. Additionally, only waste that is treated for destruction, stabilization, or disposed on-site must be evaluated for the otherwise use threshold. Since AFFF was not treated or disposed of on-site at the facility, the AFFF was also not considered otherwise used, and the individual PFAS EPCRA Section 313 reporting threshold was not applicable. Based on the evaluation of the material usage and waste data from RY 2020, PFAS did not exceed any EPCRA Section 313 activity reporting thresholds and was not required to be reported on a Form R for RY 2020. Therefore, no change is needed. |

.....

**US AIR FORCE PATRICK AFB FL (32925SRFRC1224J)  
9693 RESCUE ROAD, PATRICK AFB, FL 32925 (Region 4)**

**EPA Email – OG-1**

Region 4 Email

03/15/2022 07:52am

From: *Ezequiel Velez*

Subject: Toxics Release Inventory (TRI) Data Quality Questions - Due April 15, 2022

| Sent To                    | E-Mail Address            |
|----------------------------|---------------------------|
| To: ANTHONY F. GENNARO, JR | ANTHONY.GENNARO@US.AF.MIL |
| To: LAURIE FISHER          | LAURIE.FISHER@US.AF.MIL   |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Toxics Release Inventory (TRI) Data Quality Questions [(US AIR FORCE PATRICK AFB FL) (TRIFID: 32925SRFRC1224J)] Form R for Reporting Year(s) 2020 - Due April 15, 2022**

Tue Mar 15 11:52:03 EDT 2022

Dear LAURIE FISHER and ANTHONY F. GENNARO, JR:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Lead compounds submitted to EPA from your facility: *US AIR FORCE PATRICK AFB FL* - (TRIFID: 32925SRFRC1224J) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent

approximately 2 hazardous waste shipments (some e-Manifest #s: 2) totaling 6,223 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

- It appears your facility has sent approximately 20 shipments (sub eManifest IDs) totaling 100,135 pounds of hazardous waste listed containing Lead / Lead compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Lead / Lead compounds for reporting year 2020. Could you please review your calculations and submit a new report for Lead / Lead compounds for reporting year 2020, if needed.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=34933cd9-f29e-4c6f-b59d-a0ac68ac6ea7&target=614f1755-c5f4-4c4f-8ddd-bd9f6280392e>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 15, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Ezequiel Velez at [velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

TRI Coordinator

US EPA Region 4

UST & Data Management Section

61 Forsyth, St. S.W.

Atlanta, GA 30303

Tel. (404) 562-9191

[velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov)

[www.epa.gov/tri](http://www.epa.gov/tri)

## EPA Email – OG-2

Region 4 Email

04/12/2022 09:00am

From: *Ezequiel Velez*

Subject: Toxics Release Inventory (TRI) Data Quality Questions - Due April 29, 2022

| Sent To                    | E-Mail Address            |
|----------------------------|---------------------------|
| To: ANTHONY F. GENNARO, JR | ANTHONY.GENNARO@US.AF.MIL |
| To: LAURIE FISHER          | LAURIE.FISHER@US.AF.MIL   |

Attachments:

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Sam Nunn Atlanta Federal Center 6 Forsyth Street SW ATLANTA, GA 30303

**Toxics Release Inventory (TRI) Data Quality Questions [(US AIR FORCE PATRICK AFB FL) (TRIFID: 32925SRFRC1224J)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Apr 12 13:00:45 UTC 2022

Dear LAURIE FISHER and ANTHONY F. GENNARO, JR:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Lead compounds submitted to EPA from your facility: *US AIR FORCE PATRICK AFB FL* - (TRIFID: 32925SRFRC1224J) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 2 hazardous waste shipments (some e-Manifest #: 2) totaling 6,223 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.
- It appears your facility has sent approximately 20 shipments (sub eManifest IDs) totaling 100,135 pounds of hazardous waste listed containing Lead / Lead compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Lead / Lead compounds for reporting year 2020. Could you please review your calculations and submit a new report for Lead / Lead compounds for reporting year 2020, if needed.

***How do I respond to this inquiry? (Step 1 is always required)***

*Step 1:*

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=dd73f618-680d-4fea-aea7-de69066277db&target=614f1755-c5f4-4c4f-8ddd-bd9f6280392e>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

*Step 2:*

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Ezequiel Velez at [velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

TRI Coordinator

US EPA Region 4

UST & Data Management Section

61 Forsyth, St. S.W.

Atlanta, GA 30303

Tel. (404) 562-9191

[velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov)

[www.epa.gov/tri](http://www.epa.gov/tri)

**Email sent on 03/15/2022 11:52am**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Toxics Release Inventory (TRI) Data Quality Questions [(US AIR FORCE PATRICK AFB FL) (TRIFID: 32925SRFRC1224J)] Form R for Reporting Year(s) 2020 - Due April 15, 2022**

Tue Mar 15 11:52:03 EDT 2022

Dear LAURIE FISHER and ANTHONY F. GENNARO, JR:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Lead compounds submitted to EPA from your facility: *US AIR FORCE PATRICK AFB FL* - (TRIFID: 32925SRFRC1224J) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 2 hazardous waste shipments (some e-Manifest #: 2) totaling 6,223 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.
- It appears your facility has sent approximately 20 shipments (sub eManifest IDs) totaling 100,135 pounds of hazardous waste listed containing Lead / Lead compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Lead / Lead compounds for reporting year 2020. Could you please review your calculations and submit a new report for Lead / Lead compounds for reporting year 2020, if needed.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=34933cd9-f29e-4c6f-b59d-a0ac68ac6ea7&target=614f1755-c5f4-4c4f-8ddd-bd9f6280392e>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

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If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 15, 2022..**

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If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Ezequiel Velez at [velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

TRI Coordinator

US EPA Region 4

UST & Data Management Section

61 Forsyth, St. S.W.

Atlanta, GA 30303

Tel. (404) 562-9191

[velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov)

[www.epa.gov/tri](http://www.epa.gov/tri)

### Facility Response – IC-1

Subject: Facility Response Form

Apr 14, 2022 5:44:14 PM

From: Laurie Fisher

(321) 494-7288

[laurie.fisher@spaceforce.mil](mailto:laurie.fisher@spaceforce.mil)

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

EMAN-RNO RY 2020

- It appears your facility has sent approximately 20 shipments (sub eManifest IDs) totaling 100,135 pounds of hazardous waste listed containing Lead / Lead compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Lead / Lead compounds for reporting year 2020. Could you please review your calculations and submit a new report for Lead / Lead compounds for reporting year 2020, if needed.

The source of these releases and quantities are listed below:

| Reported Chemical   | Response   | Reporting Year<br>(if applicable) |
|---------------------|--|-----------------------------------|
| Lead compounds      | New Submission   | 2020                              |
| Reason for Response | The waste was construction/demolition debris generated during building renovation and determined to be Lead using available waste profile information. A new Form R for Lead under an establishment is being submitted to report this waste on a Form R. |                                   |

PFAS-NOT-F RY 2020

The source of these releases and quantities are listed below:

| Response            |   | Reporting Year<br>(if applicable) |
|---------------------|---|-----------------------------------|
| No Change           |   |                                   |
| Reason for Response | The reporting threshold was not triggered. The waste was generated when an aqueous film forming foam (AFFF) system was drained and removed from service in 2020 during hangar renovation. |                                   |

## Facility Response – IC-2

Subject: Facility Response Form

Apr 14, 2022 8:04:54 PM

From: Laurie Fisher

(321) 494-7288

laurie.fisher@spaceforce.mil

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

EMAN-RNO RY 2020

- It appears your facility has sent approximately 20 shipments (sub eManifest IDs) totaling 100,135 pounds of hazardous waste listed containing Lead / Lead compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Lead / Lead compounds for reporting year 2020. Could you please review your calculations and submit a new report for Lead / Lead compounds for reporting year 2020, if needed.

The source of these releases and quantities are listed below:

| Reported Chemical   | Response   | Reporting Year<br>(if applicable) |
|---------------------|--|-----------------------------------|
| Lead compounds      | New Submission   | 2020                              |
| Reason for Response | The waste was construction/demolition debris generated during building renovation and determined to be Lead using available waste profile information. A new Form R for Lead under an establishment is being submitted to report this waste on a Form R. |                                   |

PFAS-NOT-F RY 2020

The source of these releases and quantities are listed below:

| Response            |   | Reporting Year<br>(if applicable) |
|---------------------|---|-----------------------------------|
| No Change           |   |                                   |
| Reason for Response | The reporting threshold was not triggered. The waste was generated when an aqueous film forming foam (AFFF) system was drained and removed from service in 2020 during hangar renovation. |                                   |

.....

# CHEMICAL WASTE MANAGEMENT (35459CHMCLHWY17) 36964 ALABAMA HWY 17, EMELLE, AL 35459 (Region 4)

## EPA Email – OG-1

Region 4 Email

07/26/2021 05:24am

From: *Ezequiel Velez*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(CHEMICAL WASTE MANAGEMENT) (TRIFID: 35459CHMCLHWY17)] for RY 2020 - Due September 10, 2021

| Sent To             | E-Mail Address |
|---------------------|----------------|
| To: VANESSA CARAWAY | VLEWIS2@WM.COM |
| To: MIKE DAVIS      | MDAVIS2@WM.COM |

Attachments:

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

#### **Toxics Release Inventory (TRI) Data Quality Questions [(CHEMICAL WASTE MANAGEMENT) (TRIFID: 35459CHMCLHWY17)] Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Mon Jul 26 09:24:38 EDT 2021

Dear MIKE DAVIS and VANESSA CARAWAY:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Cadmium compounds, Chlorothalonil, Dioxin and dioxin-like compounds, Hexafluoropropylene oxide dimer acid, Mercury compounds and Nickel compounds submitted to EPA from your facility [(Name: CHEMICAL WASTE MANAGEMENT) - (TRIFID: 35459CHMCLHWY17)] for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Your facility reported 18,000 pounds of RCRA Subtitle C Landfills for Mercury compounds in the current year 2020. This was an increase of 4,500 pounds from the previous year amount of 13,500 pounds.

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Hexafluoropropylene oxide dimer acid to TRI for reporting year 2020, but might have received Hexafluoropropylene oxide dimer acid in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Hexafluoropropylene oxide dimer acid for reporting year 2020, if required.
- Your facility reported 22,812.3 grams of RCRA Subtitle C Landfills for Dioxin and dioxin-like compounds in the current year 2020. This was an increase of 15,163.27 grams from the previous year amount of 7,649.03 grams.
- Your facility reported 1,222,000 pounds of Total on-site disposal to UIC Class I Wells, RCRA Subtitle C landfills and other landfills for Cadmium compounds in the current year. This was an increase of 441,000 pounds from the previous year amount of 781,000 pounds.
- Your facility reported 328,000 pounds of land releases for Nickel compounds in the current year 2020. This was an a decrease of 123,000 pounds from the previous year amount of 451,000 pounds. Check the on-site land release quantities in Sections 5.4 and 5.5 of the Form R.
- Your facility reported 230,000 pounds of Total Releases for Chlorothalonil in the current year (2020) but did not report this chemical in the prior year (2019).

***How do I respond to this inquiry?***

***Step 1:***

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=91d6377e-7110-49c4-9f21-aae717ddb071&target=f23314fc-ffdd-4b7f-b257-01a5b16e8d51>

***If you indicate new submission, revision or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you would like to make any revisions, withdrawals or new submissions, **please send them to EPA by September 10, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have any follow up questions, please contact Ezequiel Velez at (404) 562-9191 or email at [velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

## **EPA Email – OG-2**

Region 4 Email

08/19/2021 06:00am

From: *Ezequiel Velez*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(CHEMICAL WASTE MANAGEMENT) (TRIFID: 35459CHMCLHWY17)] Form R for Reporting Year(s) 2020 - Due September 10, 2021

| Sent To             | E-Mail Address |
|---------------------|----------------|
| To: VANESSA CARAWAY | VLEWIS2@WM.COM |
| To: MIKE DAVIS      | MDAVIS2@WM.COM |

Attachments:

**Questions for Your Facility [(CHEMICAL WASTE MANAGEMENT) (TRIFID: 35459CHMCLHWY17)] Regarding Toxics Release Inventory (TRI) Submissions - Due September 10, 2021**

Dear MIKE DAVIS and VANESSA CARAWAY:

This email is an reminder to EPA email(s) dated July 25, 2021 about data quality questions for your facility for reporting year(s) 2020. EPA has NOT received your web response yet. ***Please send your web response ASAP.***

### **How do I respond to this inquiry?**

#### **Step 1:**

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=e36dead9-5d50-4d2e-b682-2ae577d82ff5&target=f23314fc-ffdd-4b7f-b257-01a5b16e8d51>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

#### **Step 2:**

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by September 10, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Ezequiel Velez at [velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Email sent on 07/26/2021 09:24am**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Toxics Release Inventory (TRI) Data Quality Questions [(CHEMICAL WASTE MANAGEMENT) (TRIFID: 35459CHMCLHWY17)] Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Mon Jul 26 09:24:38 EDT 2021

Dear MIKE DAVIS and VANESSA CARAWAY:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Cadmium compounds, Chlorothalonil, Dioxin and dioxin-like compounds, Hexafluoropropylene oxide dimer acid, Mercury compounds and Nickel compounds submitted to EPA from your facility [(Name:**

**CHEMICAL WASTE MANAGEMENT) - (TRIFID: 35459CHMCLHWY17] for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Your facility reported 18,000 pounds of RCRA Subtitle C Landfills for Mercury compounds in the current year 2020. This was an increase of 4,500 pounds from the previous year amount of 13,500 pounds.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Hexafluoropropylene oxide dimer acid to TRI for reporting year 2020, but might have received Hexafluoropropylene oxide dimer acid in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Hexafluoropropylene oxide dimer acid for reporting year 2020, if required.
- Your facility reported 22,812.3 grams of RCRA Subtitle C Landfills for Dioxin and dioxin-like compounds in the current year 2020. This was an increase of 15,163.27 grams from the previous year amount of 7,649.03 grams.
- Your facility reported 1,222,000 pounds of Total on-site disposal to UIC Class I Wells, RCRA Subtitle C landfills and other landfills for Cadmium compounds in the current year. This was an increase of 441,000 pounds from the previous year amount of 781,000 pounds.
- Your facility reported 328,000 pounds of land releases for Nickel compounds in the current year 2020. This was an a decrease of 123,000 pounds from the previous year amount of 451,000 pounds. Check the on-site land release quantities in Sections 5.4 and 5.5 of the Form R.
- Your facility reported 230,000 pounds of Total Releases for Chlorothalonil in the current year (2020) but did not report this chemical in the prior year (2019).

***How do I respond to this inquiry?***

*Step 1:*

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=91d6377e-7110-49c4-9f21-aae717ddb071&target=f23314fc-ffdd-4b7f-b257-01a5b16e8d51>

***If you indicate new submission, revision or withdrawal in web response questionnaire, please proceed to step 2.***

*Step 2:*

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you would like to make any revisions, withdrawals or new submissions, **please send them to EPA by September 10, 2021.**

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If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have any follow up questions, please contact Ezequiel Velez at (404) 562-9191 or email at [velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**EPA Email – OG-3**

Region 4 Email

09/07/2021 04:40am

From: *Ezequiel Velez*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To             | E-Mail Address |
|---------------------|----------------|
| To: VANESSA CARAWAY | VLEWIS2@WM.COM |
| To: MIKE DAVIS      | MDAVIS2@WM.COM |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Region 4

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

Tue Sep 07 08:40:23 EDT 2021

Dear MIKE DAVIS and VANESSA CARAWAY:

EPA would like to inform you that data quality issues raised for your facility [CHEMICAL WASTE MANAGEMENT (TRIFID: 35459CHMCLHWY17)] during reporting year 2020 Adhoc Data Quality Checks cycle are resolved for the following:

Reporting Year(s) Chemicals

2020 Cadmium compounds, Chlorothalonil, Dioxin and dioxin-like compounds, Hexafluoropropylene oxide dimer acid, Mercury compounds and Nickel compounds

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Ezequiel Velez

TRI Data Quality Program

US EPA

Region 4

**Email sent on 08/19/2021 10:00am**

**Questions for Your Facility [(CHEMICAL WASTE MANAGEMENT) (TRIFID: 35459CHMCLHWY17)] Regarding Toxics Release Inventory (TRI) Submissions - Due September 10, 2021**

Dear MIKE DAVIS and VANESSA CARAWAY:

This email is an reminder to EPA email(s) dated July 25, 2021 about data quality questions for your facility for reporting year(s) 2020. EPA has NOT received your web response yet. ***Please send your web response ASAP.***

**How do I respond to this inquiry?**

**Step 1:**

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=e36dead9-5d50-4d2e-b682-2ae577d82ff5&target=f23314fc-ffdd-4b7f-b257-01a5b16e8d51>

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**Step 2:**

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Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Email sent on 07/26/2021 09:24am**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Toxics Release Inventory (TRI) Data Quality Questions [(CHEMICAL WASTE MANAGEMENT) (RIFID: 35459CHMCLHWY17)] Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Mon Jul 26 09:24:38 EDT 2021

Dear MIKE DAVIS and VANESSA CARAWAY:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Cadmium compounds, Chlorothalonil, Dioxin and dioxin-like compounds, Hexafluoropropylene oxide dimer acid, Mercury compounds and Nickel compounds submitted to EPA from your facility [(Name: CHEMICAL WASTE MANAGEMENT) - (TRIFID: 35459CHMCLHWY17) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Your facility reported 18,000 pounds of RCRA Subtitle C Landfills for Mercury compounds in the current year 2020. This was an increase of 4,500 pounds from the previous year amount of 13,500 pounds.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS)

([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Hexafluoropropylene oxide dimer acid to TRI for reporting year 2020, but might have received Hexafluoropropylene oxide dimer acid in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Hexafluoropropylene oxide dimer acid for reporting year 2020, if required.

- Your facility reported 22,812.3 grams of RCRA Subtitle C Landfills for Dioxin and dioxin-like compounds in the current year 2020. This was an increase of 15,163.27 grams from the previous year amount of 7,649.03 grams.
- Your facility reported 1,222,000 pounds of Total on-site disposal to UIC Class I Wells, RCRA Subtitle C landfills and other landfills for Cadmium compounds in the current year. This was an increase of 441,000 pounds from the previous year amount of 781,000 pounds.
- Your facility reported 328,000 pounds of land releases for Nickel compounds in the current year 2020. This was an a decrease of 123,000 pounds from the previous year amount of 451,000 pounds. Check the on-site land release quantities in Sections 5.4 and 5.5 of the Form R.
- Your facility reported 230,000 pounds of Total Releases for Chlorothalonil in the current year (2020) but did not report this chemical in the prior year (2019).

***How do I respond to this inquiry?***

***Step 1:***

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=91d6377e-7110-49c4-9f21-aae717ddb071&target=f23314fc-ffdd-4b7f-b257-01a5b16e8d51>

***If you indicate new submission, revision or withdrawal in web response questionnaire, please proceed to step 2.***

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If you would like to make any revisions, withdrawals or new submissions, **please send them to EPA by September 10, 2021.**

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Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

### Facility Response – IC-1

Subject: Facility Response Form

Aug 23, 2021 5:20:42 PM

From: Vanessa Caraway

(337) 888-6476

vlewis2@wm.com

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

#### CARC-REL RY 2020

- Your facility reported 230,000 pounds of Total Releases for Chlorothalonil in the current year (2020) but did not report this chemical in the prior year (2019).

The source of these releases and quantities are listed below:

| Reported Chemical   | Response  | Reporting Year<br>(if applicable) |
|---------------------|---|-----------------------------------|
| Chlorothalonil      | No Change   |                                   |
| Reason for Response | We are a TSDF. Our thresholds per chemical vary year to year. In 2020 we received a profile that contained up to 100% chlorothalonil. This profile was not received in 2019. This is just one example of how our reports will vary. |                                   |

#### PBT-CNG-LND RY 2020

- Your facility reported 18,000 pounds of RCRA Subtitle C Landfills for Mercury compounds in the current year 2020. This was an increase of 4,500 pounds from the previous year amount of 13,500 pounds.
- Your facility reported 22,812.3 grams of RCRA Subtitle C Landfills for Dioxin and dioxin-like compounds in the current year 2020. This was an increase of 15,163.27 grams from the previous year amount of 7,649.03 grams.

The source of these releases and quantities are listed below:

| Reported Chemical                | Response  | Reporting Year<br>(if applicable) |
|----------------------------------|---|-----------------------------------|
| Dioxin and dioxin-like compounds | No Change   |                                   |
| Reason for Response              | We are a TSDF. It is no uncommon for our reporting thresholds to vary year over year. |                                   |
| Mercury compounds                | No Change   |                                   |
| Reason for Response              | We are a TSDF. It is no uncommon for our reporting thresholds to vary year over year. |                                   |

#### PFAS-NOT RY 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Hexafluoropropylene oxide dimer acid to TRI for reporting year 2020, but might have received Hexafluoropropylene oxide dimer acid in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Hexafluoropropylene oxide dimer acid for reporting year 2020, if required.

The source of these releases and quantities are listed below:

| Reported Chemical                    | Response  | Reporting Year<br>(if applicable) |
|--------------------------------------|---|-----------------------------------|
| Hexafluoropropylene oxide dimer acid | No Change   |                                   |
| Reason for Response                  | Based on generator supplied information, we only received 3 profiles that contained this compound. The concentrations provided along with the volume received, did not exceed the reporting threshold of 100 lbs. |                                   |

TSCA-CNG-REL RY 2020

- Your facility reported 1,222,000 pounds of Total on-site disposal to UIC Class I Wells, RCRA Subtitle C landfills and other landfills for Cadmium compounds in the current year. This was an increase of 441,000 pounds from the previous year amount of 781,000 pounds.

The source of these releases and quantities are listed below:

| Reported Chemical   | Response  | Reporting Year<br>(if applicable) |
|---------------------|---|-----------------------------------|
| Cadmium compounds   | No Change   |                                   |
| Reason for Response | We are a TSDF. It is no uncommon for our reporting thresholds to vary year over year. |                                   |

XTOX-LND-CNG RY 2020

- Your facility reported 328,000 pounds of land releases for Nickel compounds in the current year 2020. This was and a decrease of 123,000 pounds from the previous year amount of 451,000 pounds. Check the on-site land release quantities in Sections 5.4 and 5.5 of the Form R.

The source of these releases and quantities are listed below:

| Reported Chemical   | Response  | Reporting Year<br>(if applicable) |
|---------------------|---|-----------------------------------|
| Nickel compounds    | No Change   |                                   |
| Reason for Response | We are a TSDF. It is no uncommon for our reporting thresholds to vary year over year. |                                   |

.....

**DAIKIN AMERICA INC (35601DKNMRSTATE)**  
**905 STATE DOCKS RD, DECATUR, AL 35601 (Region 4)**

**EPA Email – OG-1**

Region 4 Email

07/26/2021 05:55am

From: *Ezequiel Velez*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(DAIKIN AMERICA INC) (TRIFID: 35601DKNMRSTATE)] for RY 2020 - Due September 10, 2021

| Sent To            | E-Mail Address                      |
|--------------------|-------------------------------------|
| To: WILLIAM ULRICH | DAIENVIRONMENTAL@DAIKIN-AMERICA.COM |
| To: WILLIAM ULRICH | ULRICH@DAIKIN-AMERICA.COM           |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Toxics Release Inventory (TRI) Data Quality Questions [(DAIKIN AMERICA INC) (TRIFID: 35601DKNMRSTATE)]**  
**Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Mon Jul 26 09:55:02 EDT 2021

Dear WILLIAM ULRICH:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for 1,1,2,2-Tetrahydroperfluorodecyl acrylate and 1,1,2,2-Tetrahydroperfluorododecyl acrylate submitted to EPA from your facility [(Name: DAIKIN AMERICA INC) - (TRIFID: 35601DKNMRSTATE)] for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-)

cbi\_pfas\_list\_1\_8\_2021\_final.pdf) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for 1,1,2,2-Tetrahydroperfluorododecyl acrylate to TRI for reporting year 2020, but might have reported this chemical, 1,1,2,2-Tetrahydroperfluorododecyl acrylate to 2016 CDR as manufactured / imported. Please review and submit new report for 1,1,2,2-Tetrahydroperfluorododecyl acrylate for reporting year 2020, if required.

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for 1,1,2,2-Tetrahydroperfluorododecyl acrylate to TRI for reporting year 2020, but might have reported this chemical, 1,1,2,2-Tetrahydroperfluorododecyl acrylate to 2016 CDR as manufactured / imported. Please review and submit new report for 1,1,2,2-Tetrahydroperfluorododecyl acrylate for reporting year 2020, if required.

***How do I respond to this inquiry?***

***Step 1:***

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=e2b24877-4cf7-4ad0-b8e2-31be989a95bd&target=f2b2de93-378b-43dc-a7fb-6d54461c93f0>

***If you indicate new submission, revision or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

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Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

## EPA Email – OG-2

Region 4 Email

08/19/2021 06:01am

From: *Ezequiel Velez*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(DAIKIN AMERICA INC) (TRIFID: 35601DKNMRSTATE)] Form R for Reporting Year(s) 2020 - Due September 10, 2021

| Sent To            | E-Mail Address                      |
|--------------------|-------------------------------------|
| To: WILLIAM ULRICH | DAIENVIRONMENTAL@DAIKIN-AMERICA.COM |
| To: WILLIAM ULRICH | ULRICH@DAIKIN-AMERICA.COM           |

Attachments:

### Questions for Your Facility [(DAIKIN AMERICA INC) (TRIFID: 35601DKNMRSTATE)] Regarding Toxics Release Inventory (TRI) Submissions - Due September 10, 2021

Dear WILLIAM ULRICH:

This email is an reminder to EPA email(s) dated July 25, 2021 about data quality questions for your facility for reporting year(s) 2020. EPA has NOT received your web response yet. ***Please send your web response ASAP.***

#### **How do I respond to this inquiry?**

##### **Step 1:**

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=83d2b00c-f587-4340-8d70-1a3d18f8b3a8&target=f2b2de93-378b-43dc-a7fb-6d54461c93f0>

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##### **Step 2:**

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Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Email sent on 07/26/2021 09:55am**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Toxics Release Inventory (TRI) Data Quality Questions [(DAIKIN AMERICA INC) (TRIFID: 35601DKNMRSTATE)]  
Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Mon Jul 26 09:55:02 EDT 2021

Dear WILLIAM ULRICH:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for 1,1,2,2-Tetrahydroperfluorodecyl acrylate and 1,1,2,2-Tetrahydroperfluorododecyl acrylate submitted to EPA from your facility [(Name: DAIKIN AMERICA INC) - (TRIFID: 35601DKNMRSTATE)] for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for

1,1,2,2-Tetrahydroperfluorododecyl acrylate to TRI for reporting year 2020, but might have reported this chemical, 1,1,2,2-Tetrahydroperfluorododecyl acrylate to 2016 CDR as manufactured / imported. Please review and submit new report for 1,1,2,2-Tetrahydroperfluorododecyl acrylate for reporting year 2020, if required.

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for 1,1,2,2-Tetrahydroperfluorododecyl acrylate to TRI for reporting year 2020, but might have reported this chemical, 1,1,2,2-Tetrahydroperfluorododecyl acrylate to 2016 CDR as manufactured / imported. Please review and submit new report for 1,1,2,2-Tetrahydroperfluorododecyl acrylate for reporting year 2020, if required.

***How do I respond to this inquiry?***

***Step 1:***

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=e2b24877-4cf7-4ad0-b8e2-31be989a95bd&target=f2b2de93-378b-43dc-a7fb-6d54461c93f0>

***If you indicate new submission, revision or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you would like to make any revisions, withdrawals or new submissions, **please send them to EPA by September 10, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have any follow up questions, please contact Ezequiel Velez at (404) 562-9191 or email at [velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**EPA Email – OG-3**

Region 4 Email

08/25/2021 07:48am

From: *Ezequiel Velez*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To            | E-Mail Address                      |
|--------------------|-------------------------------------|
| To: WILLIAM ULRICH | DAIENVIRONMENTAL@DAIKIN-AMERICA.COM |
| To: WILLIAM ULRICH | ULRICH@DAIKIN-AMERICA.COM           |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Region 4

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

Wed Aug 25 11:48:37 EDT 2021

Dear WILLIAM ULRICH:

EPA would like to inform you that data quality issues raised for your facility [DAIKIN AMERICA INC (TRIFID: 35601DKNMRSTATE)] during reporting year 2020 Adhoc Data Quality Checks cycle are resolved for the following:

Reporting Year(s) Chemicals

2020 1,1,2,2-Tetrahydroperfluorodecyl acrylate and 1,1,2,2-Tetrahydroperfluorododecyl acrylate

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Ezequiel Velez

TRI Data Quality Program

US EPA

Region 4

**Email sent on 08/19/2021 10:01am**

**Questions for Your Facility [(DAIKIN AMERICA INC) (TRIFID: 35601DKNMRSTATE)] Regarding Toxics Release Inventory (TRI) Submissions - Due September 10, 2021**

Dear WILLIAM ULRICH:

This email is an reminder to EPA email(s) dated July 25, 2021 about data quality questions for your facility for reporting year(s) 2020. EPA has NOT received your web response yet. ***Please send your web response ASAP.***

**How do I respond to this inquiry?**

**Step 1:**

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=83d2b00c-f587-4340-8d70-1a3d18f8b3a8&target=f2b2de93-378b-43dc-a7fb-6d54461c93f0>

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If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by September 10, 2021.**

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Thank you for your attention to this matter.

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Ezequiel Velez

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**Email sent on 07/26/2021 09:55am**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

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***How do I respond to this inquiry?***

*Step 1:*

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=e2b24877-4cf7-4ad0-b8e2-31be989a95bd&target=f2b2de93-378b-43dc-a7fb-6d54461c93f0>

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Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

### **Facility Response – IC-1**

Subject: Facility Response Form

Aug 25, 2021 11:45:43 AM

From: William Ulrich

(256) 306-5000

[ulrich@daikin-america.com](mailto:ulrich@daikin-america.com)

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

PFAS-NOT RY 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for 1,1,2,2-Tetrahydroperfluorodecyl acrylate to TRI for reporting year 2020, but might have reported this

chemical, 1,1,2,2-Tetrahydroperfluorodecyl acrylate to 2016 CDR as manufactured / imported. Please review and submit new report for 1,1,2,2-Tetrahydroperfluorodecyl acrylate for reporting year 2020, if required.

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for 1,1,2,2-Tetrahydroperfluorododecyl acrylate to TRI for reporting year 2020, but might have reported this chemical, 1,1,2,2-Tetrahydroperfluorododecyl acrylate to 2016 CDR as manufactured / imported. Please review and submit new report for 1,1,2,2-Tetrahydroperfluorododecyl acrylate for reporting year 2020, if required.

The source of these releases and quantities are listed below:

| Reported Chemical                           | Response  | Reporting Year<br>(if applicable) |
|---|---|-----------------------------------|
| 1,1,2,2-Tetrahydroperfluorodecyl acrylate   | Other   |                                   |
| Reason for Response                         | In 2012 Daikin imported NSFA Monomer, of which 1,1,2,2-Tetrahydroperfluorodecyl acrylate (CAS# 27905-45-9) is a component. The NSFA Monomer contained 247,397 pounds of 1,1,2,2-Tetrahydroperfluorodecyl acrylate. Daikin reported no volume for 2013 through 2015. 1,1,2,2-Tetrahydroperfluorodecyl acrylate was not included in Daikin's CDR 2020 since no volume was received for the reporting period (2016-2020); therefore, this chemical was not applicable to be included in the TRI for reporting year 2020.       |                                   |
| 1,1,2,2-Tetrahydroperfluorododecyl acrylate | Other   |                                   |
| Reason for Response                         | In 2012, Daikin imported NSFA Monomer, of which 1,1,2,2-Tetrahydroperfluorododecyl acrylate (CAS# 17741-60-5) is a component. The NSFA Monomer contained 76,120 pounds of 1,1,2,2-Tetrahydroperfluorododecyl acrylate. Daikin reported no volume for 2013 through 2015. 1,1,2,2-Tetrahydroperfluorododecyl acrylate was not included in Daikin's CDR 2020 since no volume was received for the reporting period (2016-2020); therefore, this chemical was not applicable to be included in the TRI for reporting year 2020. |                                   |

.....

**U.S. DOD, USAF, COLUMBUS AFB MS (39710SDDCL555SI)  
555 SIMLER BLVD SUITE 114, COLUMBUS, MS 39710 (Region 4)**

**EPA Email – OG-1**

Region 4 Email

03/15/2022 07:51am

From: *Ezequiel Velez*

Subject: Toxics Release Inventory (TRI) Data Quality Questions - Due April 15, 2022

| Sent To                    | E-Mail Address                    |
|----------------------------|-----------------------------------|
| To: MR. RICK JOHNSON       | RICK.JOHNSON@COLUMBUS.AF.MIL      |
| To: MRS. ATHENA LJUNGQUIST | ATHENA.LJUNGQUIST@COLUMBUS.AF.MIL |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Toxics Release Inventory (TRI) Data Quality Questions [(U.S. DOD, USAF, COLUMBUS AFB MS) (TRIFID: 39710SDDCL555SI)] for Reporting Year(s) 2020 - Due April 15, 2022**

Tue Mar 15 11:51:04 EDT 2022

Dear MRS. ATHENA LJUNGQUIST and MR. RICK JOHNSON:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The for NO\_VALUE submitted to EPA from your facility: U.S. DOD, USAF, COLUMBUS AFB MS) - (TRIFID: 39710SDDCL555SI) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI),

and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 1 hazardous waste shipments (some e-Manifest #: 1) totaling 16,104 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=11898c1b-4ea9-4a9d-850e-65e6cd691362&target=4e927971-19c7-4a6c-a15e-1306c1775663>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

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Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

TRI Coordinator

US EPA Region 4

UST & Data Management Section

61 Forsyth, St. S.W.

Atlanta, GA 30303

Tel. (404) 562-9191

[velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov)

[www.epa.gov/tri](http://www.epa.gov/tri)

## EPA Email – OG-2

Region 4 Email

04/12/2022 08:59am

From: *Ezequiel Velez*

Subject: Toxics Release Inventory (TRI) Data Quality Questions - Due April 29, 2022

| Sent To                    | E-Mail Address                    |
|----------------------------|-----------------------------------|
| To: MR. RICK JOHNSON       | RICK.JOHNSON@COLUMBUS.AF.MIL      |
| To: MRS. ATHENA LJUNGQUIST | ATHENA.LJUNGQUIST@COLUMBUS.AF.MIL |

Attachments:

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Toxics Release Inventory (TRI) Data Quality Questions [(U.S. DOD, USAF, COLUMBUS AFB MS) (TRIFID: 39710SDDCL555SI)] for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Apr 12 12:59:38 UTC 2022

Dear MRS. ATHENA LJUNGQUIST and MR. RICK JOHNSON:

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TRI Coordinator

US EPA Region 4

UST & Data Management Section

61 Forsyth, St. S.W.

Atlanta, GA 30303

Tel. (404) 562-9191

[velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov)

[www.epa.gov/tri](http://www.epa.gov/tri)

**Email sent on 03/15/2022 11:51am**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

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This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The for NO\_VALUE submitted to EPA from your facility: U.S. DOD, USAF, COLUMBUS AFB MS) - (TRIFID: 39710SDDCL555SI) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 1 hazardous waste shipments (some e-Manifest #: 1) totaling 16,104 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any

report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

*Step 1:*

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=11898c1b-4ea9-4a9d-850e-65e6cd691362&target=4e927971-19c7-4a6c-a15e-1306c1775663>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

*Step 2:*

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 15, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Ezequiel Velez at [velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

TRI Coordinator

US EPA Region 4

UST & Data Management Section

61 Forsyth, St. S.W.

Atlanta, GA 30303

Tel. (404) 562-9191

[velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov)

[www.epa.gov/tri](http://www.epa.gov/tri)

**EPA Email – OG-3**

Region 4 Email

04/28/2022 11:37am

From: Ezequiel Velez

Subject: Toxics Release Inventory (TRI) Data Quality Questions - Due April 29, 2022

| Sent To                    | E-Mail Address                    |
|----------------------------|-----------------------------------|
| To: MR. RICK JOHNSON       | RICK.JOHNSON@COLUMBUS.AF.MIL      |
| To: MRS. ATHENA LJUNGQUIST | ATHENA.LJUNGQUIST@COLUMBUS.AF.MIL |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Toxics Release Inventory (TRI) Data Quality Questions [(U.S. DOD, USAF, COLUMBUS AFB MS) (TRIFID: 39710SDDCL555SI)] for Reporting Year(s) 2020 - Due April 29, 2022**

Thu Apr 28 15:37:03 UTC 2022

Dear MRS. ATHENA LJUNGQUIST and MR. RICK JOHNSON:

This email is an reminder to EPA email dated March 15, 2022 about data quality questions for your facility for reporting year(s) 2020. EPA has NOT received your web response yet. ***Please send your web response ASAP.***

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The for NO\_VALUE submitted to EPA from your facility: U.S. DOD, USAF, COLUMBUS AFB MS) - (TRIFID: 39710SDDCL555SI) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 1 hazardous waste shipments (some e-Manifest #: 1) totaling 16,104 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=faf20608-a88f-46f6-afe9-13aa5576d410&target=4e927971-19c7-4a6c-a15e-1306c1775663>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Ezequiel Velez at [velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

TRI Coordinator

US EPA Region 4

UST & Data Management Section

61 Forsyth, St. S.W.

Atlanta, GA 30303

Tel. (404) 562-9191

[velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov)

[www.epa.gov/tri](http://www.epa.gov/tri)

**Email sent on 04/12/2022 12:59pm**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Toxics Release Inventory (TRI) Data Quality Questions [(U.S. DOD, USAF, COLUMBUS AFB MS) (TRIFID: 39710SDDCL555SI)] for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Apr 12 12:59:38 UTC 2022

Dear MRS. ATHENA LJUNGQUIST and MR. RICK JOHNSON:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The for NO\_VALUE submitted to EPA from your facility: U.S. DOD, USAF, COLUMBUS AFB MS) - (TRIFID: 39710SDDCL555SI) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 1 hazardous waste shipments (some e-Manifest #s: 1) totaling 16,104 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=bd5533a2-87a2-4ca9-91f2-27ae8d99fb68&target=4e927971-19c7-4a6c-a15e-1306c1775663>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022.**

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Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

TRI Coordinator

US EPA Region 4

UST & Data Management Section

61 Forsyth, St. S.W.

Atlanta, GA 30303

Tel. (404) 562-9191

[velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov)

[www.epa.gov/tri](http://www.epa.gov/tri)

Email sent on 03/15/2022 11:51am

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Toxics Release Inventory (TRI) Data Quality Questions [(U.S. DOD, USAF, COLUMBUS AFB MS) (TRIFID: 39710SDDCL555SI)] for Reporting Year(s) 2020 - Due April 15, 2022**

Tue Mar 15 11:51:04 EDT 2022

Dear MRS. ATHENA LJUNGQUIST and MR. RICK JOHNSON:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The for NO\_VALUE submitted to EPA from your facility: U.S. DOD, USAF, COLUMBUS AFB MS) - (TRIFID: 39710SDDCL555SI) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 1 hazardous waste shipments (some e-Manifest #: 1) totaling 16,104 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

*Step 1:*

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=11898c1b-4ea9-4a9d-850e-65e6cd691362&target=4e927971-19c7-4a6c-a15e-1306c1775663>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

Step 2:

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 15, 2022..**

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If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Ezequiel Velez at [velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

TRI Coordinator

US EPA Region 4

UST & Data Management Section

61 Forsyth, St. S.W.

Atlanta, GA 30303

Tel. (404) 562-9191

[velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov)

[www.epa.gov/tri](http://www.epa.gov/tri)

.....

**CALGON CARBON CORP (41129CLGNCUSROU)**  
**15024 US 23, CATLETTSBURG, KY 41129 (Region 4)**

**EPA Email – OG-1**

Region 4 Email

07/26/2021 05:21am

From: *Ezequiel Velez*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(CALGON CARBON CORP) (TRIFID: 41129CLGNCUSROU)] for RY 2020 - Due September 10, 2021

| Sent To       | E-Mail Address        |
|---------------|-----------------------|
| To: ERIC NASH | ERIC.NASH@KURARAY.COM |
| To: ERIC NASH | ERIC.NASH@KURARAY.COM |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Toxics Release Inventory (TRI) Data Quality Questions [(CALGON CARBON CORP) (TRIFID: 41129CLGNCUSROU)]**  
**Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Mon Jul 26 09:21:10 EDT 2021

Dear ERIC NASH:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Dioxin and dioxin-like compounds, Hexafluoropropylene oxide dimer acid ammonium salt, Perfluorohexanesulfonic acid, Perfluorooctane sulfonic acid and Perfluorooctanoic acid submitted to EPA from your facility [(Name: CALGON CARBON CORP) - (TRIFID: 41129CLGNCUSROU)] for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS)

([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Perfluorohexanesulfonic acid to TRI for reporting year 2020, but might have received Perfluorohexanesulfonic acid in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Perfluorohexanesulfonic acid for reporting year 2020, if required.

- Your facility reported .497 grams of Fugitive Air Release on the Form R for Dioxin and Dioxin-like compounds. However, there were no Congener data reported on the Schedule One for this medium.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Hexafluoropropylene oxide dimer acid ammonium salt to TRI for reporting year 2020, but might have received Hexafluoropropylene oxide dimer acid ammonium salt in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Hexafluoropropylene oxide dimer acid ammonium salt for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Perfluorooctanoic acid to TRI for reporting year 2020, but might have received Perfluorooctanoic acid in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Perfluorooctanoic acid for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Perfluorooctane sulfonic acid to TRI for reporting year 2020, but might have received Perfluorooctane sulfonic acid in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Perfluorooctane sulfonic acid for reporting year 2020, if required.

### ***How do I respond to this inquiry?***

#### ***Step 1:***

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=05887982-840c-4f7d-8a9a-c0f29c9e194f&target=e366357e-6236-45f1-9e56-22e1ba2f7886>

***If you indicate new submission, revision or withdrawal in web response questionnaire, please proceed to step 2.***

#### ***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you would like to make any revisions, withdrawals or new submissions, **please send them to EPA by September 10, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have any follow up questions, please contact Ezequiel Velez at (404) 562-9191 or email at [velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

## **EPA Email – OG-2**

Region 4 Email

08/19/2021 05:59am

From: *Ezequiel Velez*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(CALGON CARBON CORP) (TRIFID: 41129CLGNCUSROU)] Form R for Reporting Year(s) 2020 - Due September 10, 2021

| Sent To       | E-Mail Address        |
|---------------|-----------------------|
| To: ERIC NASH | ERIC.NASH@KURARAY.COM |
| To: ERIC NASH | ERIC.NASH@KURARAY.COM |

Attachments:

**Questions for Your Facility [(CALGON CARBON CORP) (TRIFID: 41129CLGNCUSROU)] Regarding Toxics Release Inventory (TRI) Submissions - Due September 10, 2021**

Dear ERIC NASH:

This email is an reminder to EPA email(s) dated July 25, 2021 about data quality questions for your facility for reporting year(s) 2020. EPA has NOT received your web response yet. ***Please send your web response ASAP.***

**How do I respond to this inquiry?**

**Step 1:**

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=7e3bf4c8-0e64-4e70-aac9-8864b1830390&target=e366357e-6236-45f1-9e56-22e1ba2f7886>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

**Step 2:**

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by September 10, 2021.**

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Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Email sent on 07/26/2021 09:21am**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Toxics Release Inventory (TRI) Data Quality Questions [(CALGON CARBON CORP) (TRIFID: 41129CLGNCUSROU)]  
Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Mon Jul 26 09:21:10 EDT 2021

Dear ERIC NASH:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Dioxin and dioxin-like compounds, Hexafluoropropylene oxide dimer acid ammonium salt, Perfluorohexanesulfonic acid, Perfluorooctane sulfonic acid and Perfluorooctanoic acid submitted to EPA from your facility [(Name: CALGON CARBON CORP) - (TRIFID: 41129CLGNCUSROU)] for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Perfluorohexanesulfonic acid to TRI for reporting year 2020, but might have received Perfluorohexanesulfonic acid in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Perfluorohexanesulfonic acid for reporting year 2020, if required.
- Your facility reported .497 grams of Fugitive Air Release on the Form R for Dioxin and Dioxin-like compounds. However, there were no Congener data reported on the Schedule One for this medium.
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***How do I respond to this inquiry?***

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<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=05887982-840c-4f7d-8a9a-c0f29c9e194f&target=e366357e-6236-45f1-9e56-22e1ba2f7886>

***If you indicate new submission, revision or withdrawal in web response questionnaire, please proceed to step 2.***

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If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have any follow up questions, please contact Ezequiel Velez at (404) 562-9191 or email at [velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

## EPA Email – OG-3

Region 4 Email

09/07/2021 04:21am

From: Ezequiel Velez

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(CALGON CARBON CORP) (TRIFID: 41129CLGNCUSROU)] Form R for Reporting Year(s) 2020 - Due September 10, 2021

| Sent To       | E-Mail Address        |
|---------------|-----------------------|
| To: ERIC NASH | ERIC.NASH@KURARAY.COM |
| To: ERIC NASH | ERIC.NASH@KURARAY.COM |

Attachments:

### Questions for Your Facility [(CALGON CARBON CORP) (TRIFID: 41129CLGNCUSROU)] Regarding Toxics Release Inventory (TRI) Submissions - Due September 10, 2021

Dear ERIC NASH:

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Ezequiel Velez

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Email sent on 08/19/2021 09:59am**

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Sincerely,

Ezequiel Velez

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Email sent on 07/26/2021 09:21am**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

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Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

#### **EPA Email – OG-4**

Region 4 Email

09/07/2021 08:20am

From: *Ezequiel Velez*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To       | E-Mail Address        |
|---------------|-----------------------|
| To: ERIC NASH | ERIC.NASH@KURARAY.COM |
| To: ERIC NASH | ERIC.NASH@KURARAY.COM |

Attachments:

#### **UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Region 4

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

Tue Sep 07 12:20:15 EDT 2021

Dear ERIC NASH:

EPA would like to inform you that data quality issues raised for your facility [CALGON CARBON CORP (TRIFID: 41129CLGNCUSROU)] during reporting year 2020 Adhoc Data Quality Checks cycle are resolved for the following:

Reporting Year(s) Chemicals

2020 Dioxin and dioxin-like compounds, Hexafluoropropylene oxide dimer acid ammonium salt, Perfluorohexanesulfonic acid, Perfluorooctane sulfonic acid and Perfluorooctanoic acid

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Ezequiel Velez

TRI Data Quality Program

US EPA

Region 4

**Email sent on 09/07/2021 08:21am**

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**Questions for Your Facility [(CALGON CARBON CORP) (TRIFID: 41129CLGNCUSROU)] Regarding Toxics Release Inventory (TRI) Submissions - Due September 10, 2021**

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**Email sent on 07/26/2021 09:21am**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

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- Your facility reported .497 grams of Fugitive Air Release on the Form R for Dioxin and Dioxin-like compounds. However, there were no Congener data reported on the Schedule One for this medium.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Hexafluoropropylene oxide dimer acid ammonium salt to TRI for reporting year 2020, but might have received Hexafluoropropylene oxide dimer acid ammonium salt in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Hexafluoropropylene oxide dimer acid ammonium salt for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Perfluorooctanoic acid to TRI for reporting year 2020, but might have received Perfluorooctanoic acid in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Perfluorooctanoic acid for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Perfluorooctane sulfonic acid to TRI for reporting year 2020, but might have received Perfluorooctane sulfonic acid in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Perfluorooctane sulfonic acid for reporting year 2020, if required.

### ***How do I respond to this inquiry?***

#### *Step 1:*

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=05887982-840c-4f7d-8a9a-c0f29c9e194f&target=e366357e-6236-45f1-9e56-22e1ba2f7886>

***If you indicate new submission, revision or withdrawal in web response questionnaire, please proceed to step 2.***

Step 2:

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you would like to make any revisions, withdrawals or new submissions, **please send them to EPA by September 10, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have any follow up questions, please contact Ezequiel Velez at (404) 562-9191 or email at [velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

## **EPA Email – OG-5**

Region 4 Email

09/09/2021 10:56am

From: *Ezequiel Velez*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To  | E-Mail Address   |
|--|--|
| Cc: <a href="mailto:senthil.velu@epa.gov">senthil.velu@epa.gov</a> | <a href="mailto:senthil.velu@epa.gov">senthil.velu@epa.gov</a>   |
| To: ERIC NASH  | <a href="mailto:ERIC.NASH@KURARAY.COM">ERIC.NASH@KURARAY.COM</a> |
| To: ERIC NASH  | <a href="mailto:ERIC.NASH@KURARAY.COM">ERIC.NASH@KURARAY.COM</a> |

Attachments:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 4

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

Thu Sep 09 14:55:30 EDT 2021

Dear ERIC NASH:

EPA would like to inform you that data quality issues raised for your facility [CALGON CARBON CORP (TRIFID: 41129CLGNCUSROU)] during reporting year 2020 Adhoc Data Quality Checks cycle are resolved for the following:

Reporting Year(s) Chemicals

2020 Dioxin and dioxin-like compounds, Hexafluoropropylene oxide dimer acid ammonium salt, Perfluorohexanesulfonic acid, Perfluorooctane sulfonic acid and Perfluorooctanoic acid

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Ezequiel Velez

TRI Data Quality Program

US EPA

Region 4

**Email sent on 09/07/2021 12:20pm**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 4

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

Tue Sep 07 12:20:15 EDT 2021

Dear ERIC NASH:

EPA would like to inform you that data quality issues raised for your facility [CALGON CARBON CORP (TRIFID: 41129CLGNCUSROU)] during reporting year 2020 Adhoc Data Quality Checks cycle are resolved for the following:

Reporting Year(s) Chemicals

2020 Dioxin and dioxin-like compounds, Hexafluoropropylene oxide dimer acid ammonium salt, Perfluorohexanesulfonic acid, Perfluorooctane sulfonic acid and Perfluorooctanoic acid

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Ezequiel Velez

TRI Data Quality Program

US EPA

Region 4

**Email sent on 09/07/2021 08:21am**

**Questions for Your Facility [(CALGON CARBON CORP) (TRIFID: 41129CLGNCUSROU)] Regarding Toxics Release Inventory (TRI) Submissions - Due September 10, 2021**

Dear ERIC NASH:

This email is an reminder to EPA email(s) dated August 19, 2021 and July 29, 2021 about data quality questions for your facility for reporting year(s) 2020. EPA has NOT received your web response yet. ***Please send your web response ASAP.***

**How do I respond to this inquiry?**

**Step 1:**

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=4e36dc71-f5d2-4916-b7c9-683364886c40&target=e366357e-6236-45f1-9e56-22e1ba2f7886>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

**Step 2:**

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by September 10, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Ezequiel Velez at [velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Email sent on 08/19/2021 09:59am**

**Questions for Your Facility [(CALGON CARBON CORP) (TRIFID: 41129CLGNCUSROU)] Regarding Toxics Release Inventory (TRI) Submissions - Due September 10, 2021**

Dear ERIC NASH:

This email is a reminder to EPA email(s) dated July 25, 2021 about data quality questions for your facility for reporting year(s) 2020. EPA has NOT received your web response yet. ***Please send your web response ASAP.***

**How do I respond to this inquiry?**

**Step 1:**

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=7e3bf4c8-0e64-4e70-aac9-8864b1830390&target=e366357e-6236-45f1-9e56-22e1ba2f7886>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

**Step 2:**

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by September 10, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Ezequiel Velez at [velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Email sent on 07/26/2021 09:21am**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

**Toxics Release Inventory (TRI) Data Quality Questions [(CALGON CARBON CORP) (TRIFID: 41129CLGNCUSROU)]  
Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Mon Jul 26 09:21:10 EDT 2021

Dear ERIC NASH:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Dioxin and dioxin-like compounds, Hexafluoropropylene oxide dimer acid ammonium salt, Perfluorohexanesulfonic acid, Perfluorooctane sulfonic acid and Perfluorooctanoic acid submitted to EPA from your facility [(Name: CALGON CARBON CORP) - (TRIFID: 41129CLGNCUSROU)] for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI),

and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Perfluorohexanesulfonic acid to TRI for reporting year 2020, but might have received Perfluorohexanesulfonic acid in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Perfluorohexanesulfonic acid for reporting year 2020, if required.

- Your facility reported .497 grams of Fugitive Air Release on the Form R for Dioxin and Dioxin-like compounds. However, there were no Congener data reported on the Schedule One for this medium.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Hexafluoropropylene oxide dimer acid ammonium salt to TRI for reporting year 2020, but might have received Hexafluoropropylene oxide dimer acid ammonium salt in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Hexafluoropropylene oxide dimer acid ammonium salt for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Perfluorooctanoic acid to TRI for reporting year 2020, but might have received Perfluorooctanoic acid in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Perfluorooctanoic acid for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Perfluorooctane sulfonic acid to TRI for reporting year 2020, but might have received Perfluorooctane sulfonic acid in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Perfluorooctane sulfonic acid for reporting year 2020, if required.

### ***How do I respond to this inquiry?***

#### ***Step 1:***

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=05887982-840c-4f7d-8a9a-c0f29c9e194f&target=e366357e-6236-45f1-9e56-22e1ba2f7886>

***If you indicate new submission, revision or withdrawal in web response questionnaire, please proceed to step 2.***

#### ***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare

(<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you would like to make any revisions, withdrawals or new submissions, **please send them to EPA by September 10, 2021.**

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If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have any follow up questions, please contact Ezequiel Velez at (404) 562-9191 or email at [velez.ezequiel@epa.gov](mailto:velez.ezequiel@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Ezequiel Velez

Sam Nunn Atlanta Federal Center 61 Forsyth Street SW ATLANTA, GA 30303

### Facility Response – IC-1

Subject: Facility Response Form

Sep 7, 2021 10:34:54 AM

From: Eric Nash

(606) 471-4233 [eric.nash@kuraray.com](mailto:eric.nash@kuraray.com)

Contractor Company Name: Calgon Carbon Corporation

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

DXN-NOT-SCH1 RY 2020

- Your facility reported .497 grams of Fugitive Air Release on the Form R for Dioxin and Dioxin-like compounds. However, there were no Congener data reported on the Schedule One for this medium.

The source of these releases and quantities are listed below:

| Reported Chemical                | Response                             | Reporting Year<br>(if applicable) |
|----------------------------------|--------------------------------------|-----------------------------------|
| Dioxin and dioxin-like compounds | Revision                             | 2020                              |
| Reason for Response              | A Form 1 was filled out for Dioxins. |                                   |

PFAS-NOT RY 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Hexafluoropropylene oxide dimer acid ammonium salt to TRI for reporting year 2020, but might have received Hexafluoropropylene oxide dimer acid ammonium salt in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Hexafluoropropylene oxide dimer acid ammonium salt for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Perfluorohexanesulfonic acid to TRI for reporting year 2020, but might have received Perfluorohexanesulfonic acid in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Perfluorohexanesulfonic acid for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Perfluorooctane sulfonic acid to TRI for reporting year 2020, but might have received Perfluorooctane sulfonic acid in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Perfluorooctane sulfonic acid for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Perfluorooctanoic acid to TRI for reporting year 2020, but might have received Perfluorooctanoic acid in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Perfluorooctanoic acid for reporting year 2020, if required.

The source of these releases and quantities are listed below:

| Reported Chemical                                  | Response  | Reporting Year<br>(if applicable) |
|--|---|-----------------------------------|
| Hexafluoropropylene oxide dimer acid ammonium salt | No Change   |                                   |
| Reason for Response                                | Calculations of the throughput of this compound were conducted based on analytical data for our incoming materials. Based on this calculation this compound did not meet the 100 pound threshold. |                                   |
| Perfluorohexanesulfonic acid                       | No Change   |                                   |
| Reason for Response                                | Calculations of the throughput of this compound were conducted based on analytical data for our incoming  |                                   |

| Reported Chemical             | Response  | Reporting Year<br>(if applicable) |
|-------------------------------|---|-----------------------------------|
|                               | materials. Based on this calculation this compound did not meet the 100 pound threshold.  |                                   |
| Perfluorooctane sulfonic acid |   |                                   |
| Reason for Response           |   |                                   |
| Perfluorooctanoic acid        | No Change   |                                   |
| Reason for Response           | Calculations of the throughput of this compound were conducted based on analytical data for our incoming materials. Based on this calculation this compound did not meet the 100 pound threshold. |                                   |

## Facility Response – IC-2

Subject: Facility Response Form

Sep 9, 2021 2:37:00 PM

From: Tony Feliciano

(412) 787-6794

tony.feliciano@kuraray.com

Contractor Company Name: Calgon Carbon

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

DXN-NOT-SCH1 RY 2020

- Your facility reported .497 grams of Fugitive Air Release on the Form R for Dioxin and Dioxin-like compounds. However, there were no Congener data reported on the Schedule One for this medium.

The source of these releases and quantities are listed below:

| Reported Chemical                | Response                             | Reporting Year<br>(if applicable) |
|----------------------------------|--------------------------------------|-----------------------------------|
| Dioxin and dioxin-like compounds | Revision                             | 2020                              |
| Reason for Response              | A Form 1 was filled out for Dioxins. |                                   |

PFAS-NOT RY 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Hexafluoropropylene oxide dimer acid ammonium salt to TRI for reporting year 2020, but might have received Hexafluoropropylene oxide dimer acid ammonium salt in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Hexafluoropropylene oxide dimer acid ammonium salt for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI),

and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Perfluorohexanesulfonic acid to TRI for reporting year 2020, but might have received Perfluorohexanesulfonic acid in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Perfluorohexanesulfonic acid for reporting year 2020, if required.

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Perfluorooctane sulfonic acid to TRI for reporting year 2020, but might have received Perfluorooctane sulfonic acid in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Perfluorooctane sulfonic acid for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Perfluorooctanoic acid to TRI for reporting year 2020, but might have received Perfluorooctanoic acid in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Perfluorooctanoic acid for reporting year 2020, if required.

The source of these releases and quantities are listed below:

| Reported Chemical                                  | Response   | Reporting Year<br>(if applicable) |
|--|--|-----------------------------------|
| Hexafluoropropylene oxide dimer acid ammonium salt | No Change  |                                   |
| Reason for Response                                | PFAS compound throughputs for our facility were obtained by concentrations of each compound identified present through analytical testing multiplied by the weight of spent carbon that was received by our facility, throughout the reporting year. Analysis is conducted on all new or renewing spent streams that are identified by the customer as treating for PFAS. Our analysis and calculations show that no single PFAS compound was received by the facility, within the spent carbon streams, in any quantity greater than the threshold for reporting. |                                   |
| Perfluorohexanesulfonic acid                       | No Change  |                                   |
| Reason for Response                                | PFAS compound throughputs for our facility were obtained by concentrations of each compound identified present through analytical testing multiplied by the weight of spent carbon that was received by our facility, throughout the reporting year. Analysis is conducted on all new or renewing spent streams that are identified by the customer as treating for PFAS. Our analysis and calculations show that no single PFAS compound was received by the facility, within the spent   |                                   |

| Reported Chemical             | Response   | Reporting Year<br>(if applicable) |
|-------------------------------|--|-----------------------------------|
|                               | carbon streams, in any quantity greater than the threshold for reporting.  |                                   |
| Perfluorooctane sulfonic acid |  |                                   |
| Reason for Response           |  |                                   |
| Perfluorooctanoic acid        | No Change  |                                   |
| Reason for Response           | PFAS compound throughputs for our facility were obtained by concentrations of each compound identified present through analytical testing multiplied by the weight of spent carbon that was received by our facility, throughout the reporting year. Analysis is conducted on all new or renewing spent streams that are identified by the customer as treating for PFAS. Our analysis and calculations show that no single PFAS compound was received by the facility, within the spent carbon streams, in any quantity greater than the threshold for reporting. |                                   |

.....

**HERITAGE THERMAL SERVICES (43920VNRLL1250S)**  
**1250 ST GEORGE ST, EAST LIVERPOOL, OH 43920 (Region 5)**

**EPA Email – OG-1**

Region 5 Email

08/16/2021 05:00am

From: *Kushal Som*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(HERITAGE THERMAL SERVICES) (TRIFID: 43920VNRLL1250S)] Form R for Reporting Year(s) 2020 - Due September 10, 2021

| Sent To           | E-Mail Address               |
|-------------------|------------------------------|
| Self: Kushal Som  | som.kushal@epa.gov           |
| To: RAYMOND WAYNE | RWAYNE@HERITAGE-WTI.COM      |
| To: CALEB CAMERON | CCAMERON@HERITAGE-ENVIRO.COM |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

77 West Jackson Boulevard CHICAGO, IL 60604

**Toxics Release Inventory (TRI) Data Quality Questions [(HERITAGE THERMAL SERVICES) (TRIFID: 43920VNRLL1250S)] Form R for Reporting Year 2020 - Due September 1, 2021**

Mon Aug 16 08:59:30 EDT 2021

Dear RAYMOND WAYNE and CALEB CAMERON:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Hexafluoropropylene Oxide dimer acid and Hexafluoropropylene oxide dimer acid ammonium salt submitted to EPA from your facility: *HERITAGE THERMAL SERVICES* - (TRIFID: 43920VNRLL1250S) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Hexafluoropropylene oxide dimer acid to TRI for reporting year 2020, but might have received Hexafluoropropylene oxide dimer acid in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Hexafluoropropylene oxide dimer acid for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Hexafluoropropylene oxide dimer acid ammonium salt to TRI for reporting year 2020, but might have received Hexafluoropropylene oxide dimer acid ammonium salt in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Hexafluoropropylene oxide dimer acid ammonium salt for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=10a4a224-3ed0-4d13-91e4-67358e6b8c5f&target=87842ee6-8043-4074-ac3c-7f9ec698b8fc>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by September 1, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Kushal Som at som.kushal@epa.gov.

Thank you for your attention to this matter.

Sincerely,

Kushal Som

**EPA Email – OG-2**

Headquarters Email

09/12/2021 11:59am

From: *Velu Senthil*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To                | E-Mail Address               |
|------------------------|------------------------------|
| Cc: som.kushal@epa.gov | som.kushal@epa.gov           |
| To: RAYMOND WAYNE      | RWAYNE@HERITAGE-WTI.COM      |
| To: CALEB CAMERON      | CCAMERON@HERITAGE-ENVIRO.COM |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

Sun Sep 12 15:59:15 EDT 2021

Dear RAYMOND WAYNE and CALEB CAMERON:

EPA would like to inform you that data quality issues raised for your facility [HERITAGE THERMAL SERVICES (TRIFID: 43920VNRL1250S)] during reporting year 2020 Adhoc Data Quality Checks cycle are resolved for the following:

Reporting Year(s) Chemicals

2020 Hexafluoropropylene oxide dimer acid and Hexafluoropropylene oxide dimer acid ammonium salt

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Velu Senthil

TRI Data Quality Program

US EPA

Email sent on 08/16/2021 09:00am

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

77 West Jackson Boulevard CHICAGO, IL 60604

**Toxics Release Inventory (TRI) Data Quality Questions [(HERITAGE THERMAL SERVICES) (TRIFID: 43920VNRL1250S)] Form R for Reporting Year 2020 - Due September 1, 2021**

Mon Aug 16 08:59:30 EDT 2021

Dear RAYMOND WAYNE and CALEB CAMERON:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Hexafluoropropylene Oxide dimer acid and Hexafluoropropylene oxide dimer acid ammonium salt submitted to EPA from your facility: *HERITAGE THERMAL SERVICES - (TRIFID: 43920VNRL1250S)* for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Hexafluoropropylene oxide dimer acid to TRI for reporting year 2020, but might have received Hexafluoropropylene oxide dimer acid in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Hexafluoropropylene oxide dimer acid for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Hexafluoropropylene oxide dimer acid ammonium salt to TRI for reporting year 2020, but might have

received Hexafluoropropylene oxide dimer acid ammonium salt in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Hexafluoropropylene oxide dimer acid ammonium salt for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=10a4a224-3ed0-4d13-91e4-67358e6b8c5f&target=87842ee6-8043-4074-ac3c-7f9ec698b8fc>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by September 1, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Kushal Som at [som.kushal@epa.gov](mailto:som.kushal@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Kushal Som

**Facility Response – IC-1**

Subject: Facility Response Form  
From: Caleb Matthew Cameron

(330) 386-  
2182

Aug 16, 2021 1:37:26 PM  
[ccameron@heritage-  
enviro.com](mailto:ccameron@heritage-enviro.com)

Contractor Company Name: Heritage Thermal  
Services

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

PFAS-NOT RY 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Hexafluoropropylene oxide dimer acid ammonium salt to TRI for reporting year 2020, but might have received Hexafluoropropylene oxide dimer acid ammonium salt in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Hexafluoropropylene oxide dimer acid ammonium salt for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Hexafluoropropylene oxide dimer acid to TRI for reporting year 2020, but might have received Hexafluoropropylene oxide dimer acid in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Hexafluoropropylene oxide dimer acid for reporting year 2020, if required.

The source of these releases and quantities are listed below:

| Reported Chemical                                  | Response   | Reporting Year<br>(if applicable) |
|--|--|-----------------------------------|
| Hexafluoropropylene oxide dimer acid               | No Change  |                                   |
| Reason for Response                                | Based on the characterization of waste provided to HTS by its customers in accordance with the facility's waste analysis plan, HTS has no record of receipt for this chemical. |                                   |
| Hexafluoropropylene oxide dimer acid ammonium salt | No Change  |                                   |
| Reason for Response                                | Based on the characterization of waste provided to HTS by its customers in accordance with the facility's waste analysis plan, HTS has no record of receipt for this chemical  |                                   |

.....

**TRADEBE TREATMENT & RECYCLING LLC (46312PLLTN4343K)  
4343 KENNEDY AVE, EAST CHICAGO, IN 46312 (Region 5)**

**EPA Email – OG-1**

Headquarters Email

07/22/2021 06:45am

From: *Velu Senthil*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(TRADEBE TREATMENT & RECYCLING LLC) (TRIFID: 46312PLLTN4343K)] for RY 2020 - Due September 10, 2021

| Sent To                | E-Mail Address            |
|------------------------|---------------------------|
| Cc: som.kushal@epa.gov | som.kushal@epa.gov        |
| To: MARGARITA LAGRIMAS | TITA.LAGRIMAS@TRADEBE.COM |
| To: MARGARITA LAGRIMAS | TITA.LAGRIMAS@TRADEBE.COM |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

**Toxics Release Inventory (TRI) Data Quality Questions [(TRADEBE TREATMENT & RECYCLING LLC) (TRIFID: 46312PLLTN4343K)] Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Thu Jul 22 10:44:40 EDT 2021

Dear MARGARITA LAGRIMAS:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Ethylene oxide submitted to EPA from your facility [(Name: TRADEBE TREATMENT & RECYCLING LLC) - (TRIFID: 46312PLLTN4343K)] for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Your facility reported approximately 30,024 pounds of total release and 40,084 pounds of total production waste for Ethylene oxide for reporting year 2019 but did not submit report for Ethylene oxide for reporting year 2020. Please review your calculations, and submit report for Ethylene oxide for reporting year 2020, if required.

***How do I respond to this inquiry?***

***Step 1:***

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=7e9a8ff3-b936-4a54-824a-4a72e6a13a31&target=2c549a0c-44e7-40f2-ba7e-67e2fdb2b2a2>

***If you indicate new submission, revision or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you would like to make any revisions, withdrawals or new submissions, **please send them to EPA by September 10, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have any follow up questions, please contact Velu Senthil at (202) 566-0749 or email at [senthil.velu@epa.gov](mailto:senthil.velu@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Velu Senthil

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

**EPA Email – OG-2**

Headquarters Email

07/25/2021 03:05pm

From: *Velu Senthil*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(TRADEBE TREATMENT & RECYCLING LLC) (TRIFID: 46312PLLTN4343K)] for RY 2020 - Due September 10, 2021

| Sent To                | E-Mail Address             |
|------------------------|----------------------------|
| Cc: Tim Denhof         | timothy.denhof@tradebe.com |
| To: MARGARITA LAGRIMAS | TITA.LAGRIMAS@TRADEBE.COM  |
| To: MARGARITA LAGRIMAS | TITA.LAGRIMAS@TRADEBE.COM  |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

**Toxics Release Inventory (TRI) Data Quality Questions [(TRADEBE TREATMENT & RECYCLING LLC) (TRIFID: 46312PLLTN4343K)] Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Sun Jul 25 18:57:25 EDT 2021

Dear MARGARITA LAGRIMAS:

This email is to acknowledge the receipt of your response dated July 23, 2021 for data quality question about ethylene oxide report. Your facility indicated: The 2019 report referenced in this data quality inquiry for ethylene oxide was later withdrawn due the material being a copolymer and not CAS number 75-21-8, ethylene oxide." 2019 ethylene oxide report is not yet withdrawn. Please make sure your certifying official signed your withdrawal of 2019 ethylene oxide report.

In addition to ethylene oxide report, EPA has additional data quality questions mentioned below:

**The Form R for Ethylene oxide, N-Methyl-2-pyrrolidone and Sulfonic acids, C6-12-alkane, γ-ω-perfluoro, ammonium salts submitted to EPA from your facility [(Name: TRADEBE TREATMENT & RECYCLING LLC) - (TRIFID: 46312PLLTN4343K)] for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Your facility reported approximately 30,024 pounds of total release and 40,084 pounds of total production waste for Ethylene oxide for reporting year 2019 but did not submit report for Ethylene oxide for reporting year 2020. Please review your calculations, and submit report for Ethylene oxide for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Sulfonic acids, C6-12-alkane, γ-ω-perfluoro, ammonium salts to TRI for reporting year 2020, but might

have received Sulfonic acids, C6-12-alkane,  $\gamma$ - $\omega$ -perfluoro, ammonium salts in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Sulfonic acids, C6-12-alkane,  $\gamma$ - $\omega$ -perfluoro, ammonium salts for reporting year 2020, if required.

- Your facility reported 15,581 pounds of Total off-site disposal to UIC Class I Wells, RCRA Subtitle C landfills and other landfills for N-Methyl-2-pyrrolidone in the current year. This was a decrease of 87,054 pounds from the previous year amount of 102,635 pounds.
- Your facility reported total production waste of 14684931 pounds for reporting year 2020; and this quantity is a decrease of -14368078 pounds compared to your prior reporting year 2019 reported total production waste amount of 29053009 pounds. Please review your calculations and submit a revised reports for reporting year 2020, if needed.

***How do I respond to this inquiry?***

***Step 1:***

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=9811a571-31d7-43b4-ae92-107bcff3ceac&target=2c549a0c-44e7-40f2-ba7e-67e2fdb2b2a2>

***If you indicate new submission, revision or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you would like to make any revisions, withdrawals or new submissions, **please send them to EPA by September 10, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have any follow up questions, please contact Velu Senthil at (202) 566-0749 or email at [senthil.velu@epa.gov](mailto:senthil.velu@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Velu Senthil

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

Email sent on 07/22/2021 10:45am

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

**Toxics Release Inventory (TRI) Data Quality Questions [(TRADEBE TREATMENT & RECYCLING LLC) (TRIFID: 46312PLLTN4343K)] Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Thu Jul 22 10:44:40 EDT 2021

Dear MARGARITA LAGRIMAS:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Ethylene oxide submitted to EPA from your facility [(Name: TRADEBE TREATMENT & RECYCLING LLC) - (TRIFID: 46312PLLTN4343K)] for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Your facility reported approximately 30,024 pounds of total release and 40,084 pounds of total production waste for Ethylene oxide for reporting year 2019 but did not submit report for Ethylene oxide for reporting year 2020. Please review your calculations, and submit report for Ethylene oxide for reporting year 2020, if required.

***How do I respond to this inquiry?***

*Step 1:*

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=7e9a8ff3-b936-4a54-824a-4a72e6a13a31&target=2c549a0c-44e7-40f2-ba7e-67e2fdb2b2a2>

***If you indicate new submission, revision or withdrawal in web response questionnaire, please proceed to step 2.***

*Step 2:*

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (

[32/index.html](https://www3.epa.gov/tri/tutorials/TRIT-33/index.html)), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you would like to make any revisions, withdrawals or new submissions, **please send them to EPA by September 10, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have any follow up questions, please contact Velu Senthil at (202) 566-0749 or email at [senthil.velu@epa.gov](mailto:senthil.velu@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Velu Senthil

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

### **EPA Email – OG-3**

Headquarters Email

08/02/2021 08:51am

From: *Velu Senthil*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(TRADEBE TREATMENT & RECYCLING LLC) (TRIFID: 46312PLLTN4343K)] Form R for Reporting Year(s) 2020 - Due September 10, 2021

| Sent To                | E-Mail Address   |
|------------------------|--|
| Cc: Tim Denhof         | <a href="mailto:timothy.denhof@tradebe.com">timothy.denhof@tradebe.com</a> |
| To: MARGARITA LAGRIMAS | <a href="mailto:TITA.LAGRIMAS@TRADEBE.COM">TITA.LAGRIMAS@TRADEBE.COM</a>   |
| To: MARGARITA LAGRIMAS | <a href="mailto:TITA.LAGRIMAS@TRADEBE.COM">TITA.LAGRIMAS@TRADEBE.COM</a>   |

Attachments:

### **UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

**Toxics Release Inventory (TRI) Data Quality Questions [(TRADEBE TREATMENT & RECYCLING LLC) (TRIFID: 46312PLLTN4343K)] Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Mon Aug 02 12:31:02 EDT 2021

Dear MARGARITA LAGRIMAS:

EPA received your response dated 8/1/2021. In your response you indicated no facility sent **Sulfonic acids, C6-12-alkane, γ-ω-perfluoro, ammonium salts to your facility for waste management for reporting year 2020**. SURPASS CHEMICAL CO INC, NY (TRIFID: 12204SRPSS1254B) reported sending 1,800 pounds of **Sulfonic acids, C6-12-alkane, γ-ω-perfluoro, ammonium salts to your facility for disposal for reporting year 2020**. Reporting threshold is 100 pounds for **Sulfonic acids, C6-12-alkane, γ-ω-perfluoro, ammonium salts**.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Sulfonic acids, C6-12-alkane, γ-ω-perfluoro, ammonium salts submitted to EPA from your facility: TRADEBE TREATMENT & RECYCLING LLC) - (TRIFID: 46312PLLTN4343K) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Sulfonic acids, C6-12-alkane, γ-ω-perfluoro, ammonium salts to TRI for reporting year 2020, but might have received Sulfonic acids, C6-12-alkane, γ-ω-perfluoro, ammonium salts in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Sulfonic acids, C6-12-alkane, γ-ω-perfluoro, ammonium salts for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

*Step 1:*

Begin by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=312b294d-ae8b-4586-9b33-6555a2739523&target=2c549a0c-44e7-40f2-ba7e-67e2fdb2b2a2>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

*Step 2:*

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-

MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by September 10, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Velu Senthil at [senthil.velu@epa.gov](mailto:senthil.velu@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Velu Senthil

### Facility Response – IC-1

**From:** LaGrimas, Tita <[Tita.LaGrimas@tradebe.com](mailto:Tita.LaGrimas@tradebe.com)>

**Sent:** Friday, July 23, 2021 4:31 PM

**To:** Senthil, Velu <[Senthil.Velu@epa.gov](mailto:Senthil.Velu@epa.gov)>

**Subject:** RE: [EXTERNAL] Toxics Release Inventory (TRI) Data Quality Questions [(TRADEBE TREATMENT & RECYCLING LLC) (TRIFID: 46312PLLTN4343K)] for RY 2020 - Due September 10, 2021

Take care Sir, and have a wonderful weekend.

Respectfully,

Tita

### EPA Email – OG-4

**From:** Senthil, Velu <[Senthil.Velu@epa.gov](mailto:Senthil.Velu@epa.gov)>

**Sent:** Friday, July 23, 2021 3:19 PM

**To:** LaGrimas, Tita <[Tita.LaGrimas@tradebe.com](mailto:Tita.LaGrimas@tradebe.com)>

**Cc:** Senthil, Velu <[Senthil.Velu@epa.gov](mailto:Senthil.Velu@epa.gov)>

**Subject:** RE: [EXTERNAL] Toxics Release Inventory (TRI) Data Quality Questions [(TRADEBE TREATMENT & RECYCLING LLC) (TRIFID: 46312PLLTN4343K)] for RY 2020 - Due September 10, 2021

Thanks very much for your quick response, Tita.

Velu Senthil

*(Pronoun: he, him, his)*

US EPA

202-566-0749

## Facility Response – IC-2

**From:** LaGrimas, Tita <[Tita.LaGrimas@tradebe.com](mailto:Tita.LaGrimas@tradebe.com)>

**Sent:** Friday, July 23, 2021 2:11 PM

**To:** Senthil, Velu <[Senthil.Velu@epa.gov](mailto:Senthil.Velu@epa.gov)>

**Subject:** RE: [EXTERNAL] Toxics Release Inventory (TRI) Data Quality Questions [(TRADEBE TREATMENT & RECYCLING LLC) (TRIFID: 46312PLLTN4343K)] for RY 2020 - Due September 10, 2021

Hi Velu,

I received your email below and I've requested our Midwest Regional Manager provide the response.

Respectfully,

Tita

**From:** [senthil.velu@epa.gov](mailto:senthil.velu@epa.gov) <[senthil.velu@epa.gov](mailto:senthil.velu@epa.gov)>

**Sent:** Thursday, July 22, 2021 9:47 AM

**To:** LaGrimas, Tita <[Tita.LaGrimas@tradebe.com](mailto:Tita.LaGrimas@tradebe.com)>

**Cc:** [som.kushal@epa.gov](mailto:som.kushal@epa.gov)

**Subject:** [EXTERNAL] Toxics Release Inventory (TRI) Data Quality Questions [(TRADEBE TREATMENT & RECYCLING LLC) (TRIFID: 46312PLLTN4343K)] for RY 2020 - Due September 10, 2021

**CAUTION:** Email originated from outside of TRADEBE. Do not click links or open attachments unless you recognize the sender and know the content is safe.

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

**Toxics Release Inventory (TRI) Data Quality Questions [(TRADEBE TREATMENT & RECYCLING LLC) (TRIFID: 46312PLLTN4343K)] Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Thu Jul 22 10:44:40 EDT 2021

Dear MARGARITA LAGRIMAS:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Ethylene oxide submitted to EPA from your facility [(Name: TRADEBE TREATMENT & RECYCLING LLC) - (TRIFID: 46312PLLTN4343K)] for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Your facility reported approximately 30,024 pounds of total release and 40,084 pounds of total production waste for Ethylene oxide for reporting year 2019 but did not submit report for Ethylene oxide for reporting year 2020. Please review your calculations, and submit report for Ethylene oxide for reporting year 2020, if required.

***How do I respond to this inquiry?***

***Step 1:***

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=7e9a8ff3-b936-4a54-824a-4a72e6a13a31&target=2c549a0c-44e7-40f2-ba7e-67e2fdb2b2a2>

***If you indicate new submission, revision or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

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If you would like to make any revisions, withdrawals or new submissions, **please send them to EPA by September 10, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have any follow up questions, please contact Velu Senthil at (202) 566-0749 or email at [senthil.velu@epa.gov](mailto:senthil.velu@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Velu Senthil

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

Email sent on 08/02/2021 11:21am

**EPA Email – OG-5**

Headquarters Email

08/05/2021 07:17am

From: *Velu Senthil*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To                | E-Mail Address            |
|------------------------|---------------------------|
| To: MARGARITA LAGRIMAS | TITA.LAGRIMAS@TRADEBE.COM |
| To: MARGARITA LAGRIMAS | TITA.LAGRIMAS@TRADEBE.COM |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

Thu Aug 05 11:16:50 EDT 2021

Dear MARGARITA LAGRIMAS:

EPA would like to inform you that data quality issues raised for your facility [TRADEBE TREATMENT & RECYCLING LLC (TRIFID: 46312PLLTN4343K)] during reporting year 2020 Adhoc Data Quality Checks cycle are resolved for the following:

Reporting Year(s) Chemicals

2020 Ethylene oxide, N-Methyl-2-pyrrolidone and Sulfonic acids, C6-12-alkane, γ-ω-perfluoro, ammonium salts

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Velu Senthil

TRI Data Quality Program

US EPA

**Email sent on 08/02/2021 12:51pm**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

**Toxics Release Inventory (TRI) Data Quality Questions [(TRADEBE TREATMENT & RECYCLING LLC) (TRIFID: 46312PLLTN4343K)] Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Mon Aug 02 12:31:02 EDT 2021

Dear MARGARITA LAGRIMAS:

EPA received your response dated 8/1/2021. In your response you indicated no facility sent **Sulfonic acids, C6-12-alkane, γ-ω-perfluoro, ammonium salts to your facility for waste management for reporting year 2020**. SURPASS CHEMICAL CO INC, NY (TRIFID: 12204SRPSS1254B) reported sending 1,800 pounds of **Sulfonic acids, C6-12-alkane, γ-ω-perfluoro, ammonium salts to your facility for disposal for reporting year 2020**. Reporting threshold is 100 pounds for **Sulfonic acids, C6-12-alkane, γ-ω-perfluoro, ammonium salts**.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Sulfonic acids, C6-12-alkane, γ-ω-perfluoro, ammonium salts submitted to EPA from your facility: TRADEBE TREATMENT & RECYCLING LLC) - (TRIFID: 46312PLLTN4343K) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Sulfonic acids, C6-12-alkane, γ-ω-perfluoro, ammonium salts to TRI for reporting year 2020, but might have received Sulfonic acids, C6-12-alkane, γ-ω-perfluoro, ammonium salts in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Sulfonic acids, C6-12-alkane, γ-ω-perfluoro, ammonium salts for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

*Step 1:*

Begin by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=312b294d-ae8b-4586-9b33-6555a2739523&target=2c549a0c-44e7-40f2-ba7e-67e2fdb2b2a2>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

*Step 2:*

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-

MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by September 10, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Velu Senthil at [senthil.velu@epa.gov](mailto:senthil.velu@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Velu Senthil

### **EPA Email – OG-6**

**From:** Senthil, Velu <[Senthil.Velu@epa.gov](mailto:Senthil.Velu@epa.gov)>

**Sent:** Monday, August 2, 2021 2:29 PM

**To:** LaGrimas, Tita <[Tita.LaGrimas@tradebe.com](mailto:Tita.LaGrimas@tradebe.com)>; Parra, Juan <[Parra.Juan@epa.gov](mailto:Parra.Juan@epa.gov)>

**Cc:** Lynn, Amy <[Lynn.Amy@epa.gov](mailto:Lynn.Amy@epa.gov)>; Denhof, Timothy <[timothy.denhof@tradebe.com](mailto:timothy.denhof@tradebe.com)>; Senthil, Velu <[Senthil.Velu@epa.gov](mailto:Senthil.Velu@epa.gov)>

**Subject:** RE: [EXTERNAL] RE: TRADEBE TREATMENT & RECYCLING LLC (46312PLLTN4343K)

Thanks very much, Tita.

Velu Senthil

*(Pronoun: he, him, his)*

US EPA

202-566-0749

### **Facility Response – IC-3**

**From:** LaGrimas, Tita <[Tita.LaGrimas@tradebe.com](mailto:Tita.LaGrimas@tradebe.com)>

**Sent:** Monday, August 2, 2021 2:27 PM

**To:** Senthil, Velu <[Senthil.Velu@epa.gov](mailto:Senthil.Velu@epa.gov)>; Parra, Juan <[Parra.Juan@epa.gov](mailto:Parra.Juan@epa.gov)>

**Cc:** Lynn, Amy <[Lynn.Amy@epa.gov](mailto:Lynn.Amy@epa.gov)>; Denhof, Timothy <[timothy.denhof@tradebe.com](mailto:timothy.denhof@tradebe.com)>

**Subject:** RE: [EXTERNAL] RE: TRADEBE TREATMENT & RECYCLING LLC (46312PLLTN4343K)

No worries Velu. I apologize for not certifying, I will take care of this today.

Respectfully,

Tita

#### EPA Email – OG-7

**From:** Senthil, Velu <[Senthil.Velu@epa.gov](mailto:Senthil.Velu@epa.gov)>

**Sent:** Monday, August 2, 2021 1:25 PM

**To:** LaGrimas, Tita <[Tita.LaGrimas@tradebe.com](mailto:Tita.LaGrimas@tradebe.com)>; Parra, Juan <[Parra.Juan@epa.gov](mailto:Parra.Juan@epa.gov)>

**Cc:** Lynn, Amy <[Lynn.Amy@epa.gov](mailto:Lynn.Amy@epa.gov)>; Denhof, Timothy <[timothy.denhof@tradebe.com](mailto:timothy.denhof@tradebe.com)>; Senthil, Velu <[Senthil.Velu@epa.gov](mailto:Senthil.Velu@epa.gov)>

**Subject:** RE: [EXTERNAL] RE: TRADEBE TREATMENT & RECYCLING LLC (46312PLLTN4343K)

Sorry, Tita.

Velu Senthil

*(Pronoun: he, him, his)*

US EPA

202-566-0749

#### Facility Response – IC-4

**From:** LaGrimas, Tita <[Tita.LaGrimas@tradebe.com](mailto:Tita.LaGrimas@tradebe.com)>

**Sent:** Monday, August 2, 2021 2:21 PM

**To:** Senthil, Velu <[Senthil.Velu@epa.gov](mailto:Senthil.Velu@epa.gov)>; Parra, Juan <[Parra.Juan@epa.gov](mailto:Parra.Juan@epa.gov)>

**Cc:** Lynn, Amy <[Lynn.Amy@epa.gov](mailto:Lynn.Amy@epa.gov)>; Denhof, Timothy <[timothy.denhof@tradebe.com](mailto:timothy.denhof@tradebe.com)>

**Subject:** RE: [EXTERNAL] RE: TRADEBE TREATMENT & RECYCLING LLC (46312PLLTN4343K)

Hi Velu, Tim's email address was incorrect.

Respectfully,

Tita

#### EPA Email – OG-8

**From:** Senthil, Velu <[Senthil.Velu@epa.gov](mailto:Senthil.Velu@epa.gov)>

**Sent:** Monday, August 2, 2021 1:18 PM

**To:** Parra, Juan <[Parra.Juan@epa.gov](mailto:Parra.Juan@epa.gov)>

**Cc:** Lynn, Amy <[Lynn.Amy@epa.gov](mailto:Lynn.Amy@epa.gov)>; [tim.denhoff@tradebe.co](mailto:tim.denhoff@tradebe.co); LaGrimas, Tita <[Tita.LaGrimas@tradebe.com](mailto:Tita.LaGrimas@tradebe.com)>

**Subject:** [EXTERNAL] RE: TRADEBE TREATMENT & RECYCLING LLC (46312PLLTN4343K)

Thanks Juan.

Tita – Can you please certify the withdrawal request for 2019 ethylene oxide report?

Thanks again.

Velu Senthil

*(Pronoun: he, him, his)*

US EPA

202-566-0749

### EPA Email – OG-9

**From:** Parra, Juan <[Parra.Juan@epa.gov](mailto:Parra.Juan@epa.gov)>

**Sent:** Monday, August 2, 2021 2:07 PM

**To:** Senthil, Velu <[Senthil.Velu@epa.gov](mailto:Senthil.Velu@epa.gov)>

**Cc:** Lynn, Amy <[Lynn.Amy@epa.gov](mailto:Lynn.Amy@epa.gov)>

**Subject:** RE: TRADEBE TREATMENT & RECYCLING LLC (46312PLLTN4343K)

Hola Velu:

This issue with this facility is that they have not certified the withdrawal that Timothy Denhof prepared. It was assigned to Magarita Lagrimas (TITALAGRIMASTRADEBE). She was notified on August 2, 2021 10:26 AM EST of pending form to be certified. She has this form in the Pending Submission folder in TRI-MEweb in her CO CDX account. Screenshots below are from their TRI-MEweb account.

Have a good day.

### EPA Email – OG-10

**From:** Senthil, Velu <[Senthil.Velu@epa.gov](mailto:Senthil.Velu@epa.gov)>

**Sent:** Monday, August 2, 2021 1:29 PM

**To:** Senthil, Velu <[Senthil.Velu@epa.gov](mailto:Senthil.Velu@epa.gov)>; Parra, Juan <[Parra.Juan@epa.gov](mailto:Parra.Juan@epa.gov)>

**Subject:** TRADEBE TREATMENT & RECYCLING LLC (46312PLLTN4343K)

Hi Juan,

This facility

[TRADEBE TREATMENT & RECYCLING LLC (46312PLLTN4343K)

4343 KENNEDY AVE, EAST CHICAGO, IN 46312]

claims it submitted withdrawal request on August 31, 2020 for 2019 ethylene oxide report:

[2019 Ethylene Oxide report was withdrawn last year during the data quality review, however it was not certified for withdrawal. Withdrawal notice sent to USEPA via CDX on Aug 31, 2020 9:06:53 AM. The withdrawal has been repeated with this submission.]

2019 ethylene oxide report is still active.

Can you please look into this issue?

Velu Senthil

*(Pronoun: he, him, his)*

US EPA

202-566-0749

Email sent on 08/02/2021 11:21am

TRADEBE TREATMENT & RECYCLING LLC - 46312PLLTN4343K submitted a web response on Aug 2, 2021 11:21:02 AM. A PDF copy of the web response is attached.

### Facility Response – IC-5

Subject: Facility Response Form

Jul 23, 2021 5:02:02 PM

From: Tim Denhof

(219) 397-3951 timothy.denhof@tradebe.com

Contractor Company Name: Tradebe Treatment and Recycling, LLC

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

ETO-REP RY 2020

- Your facility reported approximately 30,024 pounds of total release and 40,084 pounds of total production waste for Ethylene oxide for reporting year 2019 but did not submit report for Ethylene oxide for reporting year 2020. Please review your calculations, and submit report for Ethylene oxide for reporting year 2020, if required.

The source of these releases and quantities are listed below:

| Reported Chemical   | Response  | Reporting Year<br>(if applicable) | CUSTOM_COUMN_2 (RENAME) |
|---------------------|---|-----------------------------------|-------------------------|
| Ethylene oxide      | No Change   |                                   | null                    |
| Reason for Response | The 2019 report referenced in this data quality inquiry for ethylene oxide was later withdrawn due the material being a copolymer and not CAS number 75-21-8, ethylene oxide. |                                   |                         |

### Facility Response – IC-6

Subject: Facility Response Form

Aug 5, 2021 11:13:07 AM

From: Tim Denhof

(219) 397-3951 timothy.denhof@tradebe.com

Contractor Company Name: Tradebe Treatment and Recycling, LLC

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

PFAS-NOT RY 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Sulfonic acids, C6-12-alkane, γ-ω-perfluoro, ammonium salts to TRI for reporting year 2020, but might have received Sulfonic acids, C6-12-alkane, γ-ω-perfluoro, ammonium salts in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Sulfonic acids, C6-12-alkane, γ-ω-perfluoro, ammonium salts for reporting year 2020, if required.

The source of these releases and quantities are listed below:

| Reported Chemical   | Response   | Reporting Year<br>(if applicable) |
|---|--|-----------------------------------|
| Sulfonic acids, C6-12-alkane, γ-ω-perfluoro, ammonium salts | No Change  |                                   |
| Reason for Response   | We have reviewed for a third time all shipments in 2020 from this customer and no such material has been identified on the profiles referenced in those shipments. |                                   |

.....

**WAYNE DISPOSAL INC (48111WYNDS49350)**  
**49350 N I-94 SERVICE DR, BELLEVILLE, MI 48111 (Region 5)**

**EPA Email – OG-1**

Headquarters Email

07/25/2021 03:18pm

From: *Velu Senthil*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(WAYNE DISPOSAL INC) (TRIFID: 48111WYNDS49350)] for RY 2020 - Due September 10, 2021

| Sent To           | E-Mail Address              |
|-------------------|-----------------------------|
| To: DAVE CRUMRINE | DAVE.CRUMRINE@USECOLOGY.COM |
| To: SYLWIA SCOTT  | SYLWIA.SCOTT@USECOLOGY.COM  |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

**Toxics Release Inventory (TRI) Data Quality Questions [(WAYNE DISPOSAL INC) (TRIFID: 48111WYNDS49350)]**  
**Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Sun Jul 25 19:18:14 EDT 2021

Dear SYLWIA SCOTT and DAVE CRUMRINE:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Asbestos (friable), Benzo[g,h,i]perylene, Chromium compounds (except for chromite ore mined in the Transvaal Region), Dioxin and dioxin-like compounds, Hexafluoropropylene oxide dimer acid, Lead compounds, N-Methyl-2-pyrrolidone and Nickel compounds submitted to EPA from your facility [(Name: WAYNE DISPOSAL INC) - (TRIFID: 48111WYNDS49350)] for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Your facility reported .145 grams of RCRA Subtitle C Landfills for Dioxin and dioxin-like compounds in the current year 2020. This was a decrease of 935.095 grams from the previous year amount of 935.24 grams.
- Your facility reported 16,001.8043 pounds of Total on-site disposal to UIC Class I Wells, RCRA Subtitle C landfills and other landfills for N-Methyl-2-pyrrolidone in the current year. This was a decrease of 139,182.4757 pounds from the previous year amount of 155,184.28 pounds.
- Your facility reported 306,534.14 pounds of land releases for Chromium compounds (except for chromite ore mined in the Transvaal Region) in the current year 2020. This was an increase of 137,272.36 pounds from the previous year amount of 169,261.78 pounds. Check the on-site land release quantities in Sections 5.4 and 5.5 of the Form R.
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- Your facility reported 1,980,345.334 pounds of land releases for Asbestos (friable) in the current year 2020. This was an increase of 790,069.894 pounds from the previous year amount of 1,190,275.44 pounds. Check the on-site land release quantities in Sections 5.4 and 5.5 of the Form R.
- Your facility reported 43.4 grams of RCRA Subtitle C Landfills for Dioxin and dioxin-like compounds in the current year 2020. This was an increase of 37.771 grams from the previous year amount of 5.629 grams.
- Your facility reported 2,629.1469 pounds of RCRA Subtitle C Landfills for Benzo[g,h,i]perylene in the current year 2020. This was an increase of 2,293.9669 pounds from the previous year amount of 335.18 pounds.
- Your facility reported 566,032.65 pounds of RCRA Subtitle C Landfills for Lead compounds in the current year 2020. This was an increase of 489,267.19 pounds from the previous year amount of 76,765.46 pounds.
- Your facility reported 408,251.0273 pounds of Total on-site disposal to UIC Class I Wells, RCRA Subtitle C landfills and other landfills for Nickel compounds in the current year. This was an increase of 267,102.90793 pounds from the previous year amount of 141,148.11937 pounds.

***How do I respond to this inquiry?***

***Step 1:***

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=957d288c-d3ac-4100-9217-bd78461091a7&target=5da2f137-7451-40de-90bd-56cd57811e1c>

***If you indicate new submission, revision or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI

reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you would like to make any revisions, withdrawals or new submissions, **please send them to EPA by September 10, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have any follow up questions, please contact Velu Senthil at (202) 566-0749 or email at [senthil.velu@epa.gov](mailto:senthil.velu@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Velu Senthil

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

## **EPA Email – OG-2**

Headquarters Email

08/04/2021 11:01am

From: *Velu Senthil*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(WAYNE DISPOSAL INC) (TRIFID: 48111WYNDS49350)] Form R for Reporting Year(s) 2020 - Due September 10, 2021

| Sent To           | E-Mail Address              |
|-------------------|-----------------------------|
| To: DAVE CRUMRINE | DAVE.CRUMRINE@USECOLOGY.COM |
| To: SYLWIA SCOTT  | SYLWIA.SCOTT@USECOLOGY.COM  |

Attachments:

### **UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

**Toxics Release Inventory (TRI) Data Quality Questions [(WAYNE DISPOSAL INC) (TRIFID: 48111WYNDS49350)]  
Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Wed Aug 04 14:54:26 EDT 2021

Dear SYLWIA SCOTT and DAVE CRUMRINE:

EPA received your facility's response. Your facility indicated "No Change" for data quality question for Hexafluoropropylene oxide dimer acid, a PFAS chemical. "GIANT CEMENT CO, SC" reported transferring approximately 225 pounds of Hexafluoropropylene oxide dimer acid to your facility for disposal in RCRA sub title C landfill. The reportable threshold for Hexafluoropropylene oxide dimer acid is 100 pounds.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Hexafluoropropylene oxide dimer acid submitted to EPA from your facility: WAYNE DISPOSAL INC) - (TRIFID: 48111WYNDS49350) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Hexafluoropropylene oxide dimer acid to TRI for reporting year 2020, but might have received Hexafluoropropylene oxide dimer acid in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Hexafluoropropylene oxide dimer acid for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

*Step 1:*

Begin by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=f4d3d182-42ce-4974-b258-21a94bcde083&target=5da2f137-7451-40de-90bd-56cd57811e1c>

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*Step 2:*

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If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by September 10, 2021.**

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Thank you for your attention to this matter.

Sincerely,

Velu Senthil

**Email sent on 07/25/2021 07:18pm**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

**Toxics Release Inventory (TRI) Data Quality Questions [(WAYNE DISPOSAL INC) (TRIFID: 48111WYNDS49350)]  
Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Sun Jul 25 19:18:14 EDT 2021

Dear SYLWIA SCOTT and DAVE CRUMRINE:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

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- Your facility reported 306,534.14 pounds of land releases for Chromium compounds (except for chromite ore mined in the Transvaal Region) in the current year 2020. This was an an increase of 137,272.36

pounds from the previous year amount of 169,261.78 pounds. Check the on-site land release quantities in Sections 5.4 and 5.5 of the Form R.

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#### ***How do I respond to this inquiry?***

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Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=957d288c-d3ac-4100-9217-bd78461091a7&target=5da2f137-7451-40de-90bd-56cd57811e1c>

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##### *Step 2:*

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Thank you for your attention to this matter.

Sincerely,

Velu Senthil

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

**EPA Email – OG-3**

Headquarters Email

08/04/2021 11:53am

From: *Velu Senthil*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To            | E-Mail Address   |
|--------------------|--|
| Self: Velu Senthil | <a href="mailto:senthil.velu@epa.gov">senthil.velu@epa.gov</a>               |
| To: DAVE CRUMRINE  | <a href="mailto:DAVE.CRUMRINE@USECOLOGY.COM">DAVE.CRUMRINE@USECOLOGY.COM</a> |
| To: SYLWIA SCOTT   | <a href="mailto:SYLWIA.SCOTT@USECOLOGY.COM">SYLWIA.SCOTT@USECOLOGY.COM</a>   |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

Wed Aug 04 15:52:57 EDT 2021

Dear SYLWIA SCOTT and DAVE CRUMRINE:

EPA would like to inform you that data quality issues raised for your facility [WAYNE DISPOSAL INC (TRIFID: 48111WYNDS49350)] during reporting year 2020 Adhoc Data Quality Checks cycle are resolved for the following:

Reporting Year(s) Chemicals

2020 Asbestos (friable), Benzo[g,h,i]perylene, Chromium compounds (except for chromite ore mined in the Transvaal Region), Dioxin and dioxin-like compounds, Hexafluoropropylene oxide dimer acid, Lead compounds, N-Methyl-2-pyrrolidone and Nickel compounds

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Velu Senthil

TRI Data Quality Program

US EPA

**Email sent on 08/04/2021 03:01pm**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

**Toxics Release Inventory (TRI) Data Quality Questions [(WAYNE DISPOSAL INC) (TRIFID: 48111WYNDS49350)]  
Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Wed Aug 04 14:54:26 EDT 2021

Dear SYLWIA SCOTT and DAVE CRUMRINE:

EPA received your facility's response. Your facility indicated "No Change" for data quality question for Hexafluoropropylene oxide dimer acid, a PFAS chemical. "GIANT CEMENT CO, SC" reported transferring approximately 225 pounds of Hexafluoropropylene oxide dimer acid to your facility for disposal in RCRA sub-title C landfill. The reportable threshold for Hexafluoropropylene oxide dimer acid is 100 pounds.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Hexafluoropropylene oxide dimer acid submitted to EPA from your facility: *WAYNE DISPOSAL INC* - (TRIFID: 48111WYNDS49350) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Hexafluoropropylene oxide dimer acid to TRI for reporting year 2020, but might have received

Hexafluoropropylene oxide dimer acid in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Hexafluoropropylene oxide dimer acid for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

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Thank you for your attention to this matter.

Sincerely,

Velu Senthil

**Email sent on 07/25/2021 07:18pm**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

**Toxics Release Inventory (TRI) Data Quality Questions [(WAYNE DISPOSAL INC) (TRIFID: 48111WYNDS49350)]  
Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Sun Jul 25 19:18:14 EDT 2021

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- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Hexafluoropropylene oxide dimer acid to TRI for reporting year 2020, but might have received Hexafluoropropylene oxide dimer acid in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Hexafluoropropylene oxide dimer acid for reporting year 2020, if required.
- Your facility reported 1,980,345.334 pounds of land releases for Asbestos (friable) in the current year 2020. This was an increase of 790,069.894 pounds from the previous year amount of 1,190,275.44 pounds. Check the on-site land release quantities in Sections 5.4 and 5.5 of the Form R.
- Your facility reported 43.4 grams of RCRA Subtitle C Landfills for Dioxin and dioxin-like compounds in the current year 2020. This was an increase of 37.771 grams from the previous year amount of 5.629 grams.
- Your facility reported 2,629.1469 pounds of RCRA Subtitle C Landfills for Benzo[g,h,i]perylene in the current year 2020. This was an increase of 2,293.9669 pounds from the previous year amount of 335.18 pounds.

- Your facility reported 566,032.65 pounds of RCRA Subtitle C Landfills for Lead compounds in the current year 2020. This was an increase of 489,267.19 pounds from the previous year amount of 76,765.46 pounds.
- Your facility reported 408,251.0273 pounds of Total on-site disposal to UIC Class I Wells, RCRA Subtitle C landfills and other landfills for Nickel compounds in the current year. This was an increase of 267,102.90793 pounds from the previous year amount of 141,148.11937 pounds.

***How do I respond to this inquiry?***

***Step 1:***

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=957d288c-d3ac-4100-9217-bd78461091a7&target=5da2f137-7451-40de-90bd-56cd57811e1c>

***If you indicate new submission, revision or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you would like to make any revisions, withdrawals or new submissions, **please send them to EPA by September 10, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have any follow up questions, please contact Velu Senthil at (202) 566-0749 or email at [senthil.velu@epa.gov](mailto:senthil.velu@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Velu Senthil

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

**Facility Response – IC-1**

Subject: Facility Response Form

Aug 4, 2021 10:14:14 AM

From: Sylwia Scott

(734) 699-6294

sylwia.scott@usecology.com

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

#### PBT-CNG-LND RY 2020

- Your facility reported .145 grams of RCRA Subtitle C Landfills for Dioxin and dioxin-like compounds in the current year 2020. This was a decrease of 935.095 grams from the previous year amount of 935.24 grams.
- Your facility reported 2,629.1469 pounds of RCRA Subtitle C Landfills for Benzo[g,h,i]perylene in the current year 2020. This was an increase of 2,293.9669 pounds from the previous year amount of 335.18 pounds.
- Your facility reported 43.4 grams of RCRA Subtitle C Landfills for Dioxin and dioxin-like compounds in the current year 2020. This was an increase of 37.771 grams from the previous year amount of 5.629 grams.
- Your facility reported 566,032.65 pounds of RCRA Subtitle C Landfills for Lead compounds in the current year 2020. This was an increase of 489,267.19 pounds from the previous year amount of 76,765.46 pounds.

The source of these releases and quantities are listed below:

| Reported Chemical                | Response  | Reporting Year<br>(if applicable) |
|----------------------------------|---|-----------------------------------|
| Benzo[g,h,i]perylene             | No Change   |                                   |
| Reason for Response              | Facility is a hazardous waste treatment storage and disposal facility that receives various waste streams from numerous generators. Waste streams vary in volumes and constituent concentrations. |                                   |
| Dioxin and dioxin-like compounds | No Change   |                                   |
| Reason for Response              | Facility is a hazardous waste treatment storage and disposal facility that receives various waste streams from numerous generators. Waste streams vary in volumes and constituent concentrations. |                                   |
| Lead compounds                   | No Change   |                                   |
| Reason for Response              | Facility is a hazardous waste treatment storage and disposal facility that receives various waste streams from numerous generators. Waste streams vary in volumes and constituent concentrations. |                                   |

#### PFAS-NOT RY 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Hexafluoropropylene oxide dimer acid to TRI for reporting year 2020, but might have received Hexafluoropropylene oxide dimer acid in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Hexafluoropropylene oxide dimer acid for reporting year 2020, if required.

The source of these releases and quantities are listed below:

| Reported Chemical                    | Response             | Reporting Year<br>(if applicable) |
|--------------------------------------|----------------------|-----------------------------------|
| Hexafluoropropylene oxide dimer acid | No Change            |                                   |
| Reason for Response                  | TSCA-CNG-REL RY 2020 |                                   |

- Your facility reported 16,001.8043 pounds of Total on-site disposal to UIC Class I Wells, RCRA Subtitle C landfills and other landfills for N-Methyl-2-pyrrolidone in the current year. This was a decrease of 139,182.4757 pounds from the previous year amount of 155,184.28 pounds.
- Your facility reported 408,251.0273 pounds of Total on-site disposal to UIC Class I Wells, RCRA Subtitle C landfills and other landfills for Nickel compounds in the current year. This was an increase of 267,102.90793 pounds from the previous year amount of 141,148.11937 pounds.

The source of these releases and quantities are listed below:

| Reported Chemical      | Response  | Reporting Year<br>(if applicable) |
|------------------------|---|-----------------------------------|
| N-Methyl-2-pyrrolidone | Other   |                                   |
| Reason for Response    | Facility is a hazardous waste treatment storage and disposal facility that receives various waste streams from numerous generators. Waste streams vary in volumes and constituent concentrations. |                                   |
| Nickel compounds       | No Change   |                                   |
| Reason for Response    | Facility is a hazardous waste treatment storage and disposal facility that receives various waste streams from numerous generators. Waste streams vary in volumes and constituent concentrations. |                                   |

XTOX-LND-CNG RY 2020

- Your facility reported 1,980,345.334 pounds of land releases for Asbestos (friable) in the current year 2020. This was an an increase of 790,069.894 pounds from the previous year amount of 1,190,275.44 pounds. Check the on-site land release quantities in Sections 5.4 and 5.5 of the Form R.
- Your facility reported 306,534.14 pounds of land releases for Chromium compounds (except for chromite ore mined in the Transvaal Region) in the current year 2020. This was an an increase of 137,272.36 pounds from the previous year amount of 169,261.78 pounds. Check the on-site land release quantities in Sections 5.4 and 5.5 of the Form R.

The source of these releases and quantities are listed below:

| Reported Chemical   | Response  | Reporting Year<br>(if applicable) |
|---------------------|---|-----------------------------------|
| Asbestos (friable)  | No Change   |                                   |
| Reason for Response | Facility is a hazardous waste treatment storage and disposal facility that receives various waste streams from numerous generators. Waste streams vary in volumes and constituent concentrations. |                                   |

| Reported Chemical  | Reporting Year (if Response applicable)   |
|--|---|
| Chromium compounds (except for chromite ore mined in the Transvaal Region) | No Change   |
| Reason for Response  | Facility is a hazardous waste treatment storage and disposal facility that receives various waste streams from numerous generators. Waste streams vary in volumes and constituent concentrations. |

## Facility Response – IC-2

Subject: Facility Response Form

Aug 4, 2021 3:46:58 PM

From: Sylwia Scott

(734) 699-6924

sylwia.scott@usecology.com

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

PFAS-NOT RY 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Hexafluoropropylene oxide dimer acid to TRI for reporting year 2020, but might have received Hexafluoropropylene oxide dimer acid in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Hexafluoropropylene oxide dimer acid for reporting year 2020, if required.

The source of these releases and quantities are listed below:

| Reported Chemical                    | Response  | Reporting Year (if applicable) |
|--------------------------------------|---|--------------------------------|
| Hexafluoropropylene oxide dimer acid | No Change   |                                |
| Reason for Response                  | Hexafluoropropylene oxide dimer acid was not identified in the waste received |                                |

.....



## PETRO-CHEM PROCESSING GROUP (48214PTRCH421LY) 421 LYCASTE, DETROIT, MI 48214 (Region 5)

### EPA Email – OG-1

Region 5 Email

04/08/2022 07:02pm

From: *Kushal Som*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(PETRO-CHEM PROCESSING GROUP) (TRIFID: 48214PTRCH421LY)] for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To           | E-Mail Address     |
|-------------------|--------------------|
| Self: Kushal Som  | som.kushal@epa.gov |
| To: JEFFREY DAVIS | JDAVIS@PSCNOW.COM  |
| To: JEFFREY DAVIS | JDAVIS@PSCNOW.COM  |

Attachments:

#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

77 West Jackson Boulevard CHICAGO, IL 60604

#### Toxics Release Inventory (TRI) Data Quality Questions [(PETRO-CHEM PROCESSING GROUP) (TRIFID: 48214PTRCH421LY)] for Reporting Year 2020 - Due April 29, 2022

Fri Apr 08 22:59:36 UTC 2022

Dear JEFFREY DAVIS:

This EPA data quality check EPA is a follow-up to your Toxics Release Inventory (TRI) report for reporting year 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submissions regarding the below observations and make corrections, if necessary.

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have received approximately seven hazardous waste shipments totaling 182,102 pounds listed containing PFAS, PFOA,

PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new reports for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimwebmod.epa.gov/cdx-tri-quest/questionnaire?survey=84575278-61a2-4aa5-a9c4-973039d33e0a&target=569d2ddd-ced5-4d3a-9af0-f04c39757fb3>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete and certify them in your CDX reporting account by April 29, 2022.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Kushal Som at [som.kushal@epa.gov](mailto:som.kushal@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Kushal Som

**EPA Email – OG-2**

Region 5 Email

04/26/2022 06:52am

From: *Kushal Som*

Subject: Questions for Your Facility [(PETRO-CHEM PROCESSING GROUP) (TRIFID: 48214PTRCH421LY)] Regarding  
Toxics Release Inventory (TRI) Submissions - Due April 29, 2022

| Sent To           | E-Mail Address     |
|-------------------|--------------------|
| Self: Kushal Som  | som.kushal@epa.gov |
| To: JEFFREY DAVIS | JDAVIS@PSCNOW.COM  |
| To: JEFFREY DAVIS | JDAVIS@PSCNOW.COM  |

Attachments:

**Questions for Your Facility [(PETRO-CHEM PROCESSING GROUP) (TRIFID: 48214PTRCH421LY)] Regarding Toxics  
Release Inventory (TRI) Submissions - Due April 29, 2022**

Dear JEFFREY DAVIS:

This email is an reminder to EPA email dated March 7, 2022 about data quality questions for your facility for reporting year(s) 2020. EPA has NOT received your web response yet. ***Please send your web response ASAP.***

**How do I respond to this inquiry?**

**Step 1:**

Please respond by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=0c025b74-f0c8-4cc2-9845-08e100ee6e0b&target=569d2ddd-ced5-4d3a-9af0-f04c39757fb3>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

**Step 2:**

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Kushal Som at som.kushal@epa.gov.

Thank you for your attention to this matter.

Sincerely,

Kushal Som

77 West Jackson Boulevard CHICAGO, IL 60604

Email sent on 04/08/2022 11:02pm

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

77 West Jackson Boulevard CHICAGO, IL 60604

**Toxics Release Inventory (TRI) Data Quality Questions [(PETRO-CHEM PROCESSING GROUP) (TRIFID: 48214PTRCH421LY)] for Reporting Year 2020 - Due April 29, 2022**

Fri Apr 08 22:59:36 UTC 2022

Dear JEFFREY DAVIS:

This EPA data quality check EPA is a follow-up to your Toxics Release Inventory (TRI) report for reporting year 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submissions regarding the below observations and make corrections, if necessary.

**Reporting Year 2020**

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have received approximately seven hazardous waste shipments totaling 182,102 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new reports for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=84575278-61a2-4aa5-a9c4-973039d33e0a&target=569d2ddd-ced5-4d3a-9af0-f04c39757fb3>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

*Step 2:*

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete and certify them in your CDX reporting account by April 29, 2022.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Kushal Som at [som.kushal@epa.gov](mailto:som.kushal@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Kushal Som

**FORD MOTOR COMPANY-STERLING I  
PLANT (48310FRDMT39000)  
39000 MOUND RD, STERLING HEIGHTS, MI 48310 (Region 5)**

**EPA Email – OG-1**

Region 5 Email

04/08/2022 08:14am

From: *Kushal Som*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(FORD MOTOR COMPANY-STERLING I PLANT) (TRIFID: 48310FRDMT39000)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To               | E-Mail Address     |
|-----------------------|--------------------|
| Self: Kushal Som      | som.kushal@epa.gov |
| To: JACQUELINE WALKER | JWALKER6@FORD.COM  |
| To: ADAM ALBRIGHT     | AALBRIG2@FORD.COM  |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

77 West Jackson Boulevard CHICAGO, IL 60604

**Toxics Release Inventory (TRI) Data Quality Questions [(FORD MOTOR COMPANY-STERLING I PLANT) (TRIFID: 48310FRDMT39000)] Form R for Reporting Year 2020 - Due April 29, 2022**

Fri Apr 08 12:11:30 UTC 2022

Dear ADAM ALBRIGHT and JACQUELINE WALKER:

This EPA data quality check EPA is a follow-up to your Toxics Release Inventory (TRI) report for reporting year 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submissions regarding the below observations and make corrections, if necessary.

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by TRI, and the threshold for each

chemical is 100 pounds per year. Your facility appears to have sent one hazardous waste shipment totaling 16,797 pounds of listed PFAS chemicals, containing PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for the TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report(s) for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=39321fe2-298a-4217-b08e-81d14a909c26&target=bc9002dd-6258-4052-a782-cd274c14a5e4>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete and certify them in your CDX reporting account by April 29, 2022.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Kushal Som at [som.kushal@epa.gov](mailto:som.kushal@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Kushal Som

**EPA Email – OG-2**

Region 5 Email

04/26/2022 07:01am

From: *Kushal Som*

Subject: Questions for Your Facility [(FORD MOTOR COMPANY-STERLING I PLANT) (TRIFID: 48310FRDMT39000)]  
Regarding Toxics Release Inventory (TRI) Submissions - Due April 29, 2022

| Sent To               | E-Mail Address     |
|-----------------------|--------------------|
| Self: Kushal Som      | som.kushal@epa.gov |
| To: JACQUELINE WALKER | JWALKER6@FORD.COM  |
| To: ADAM ALBRIGHT     | AALBRIG2@FORD.COM  |

Attachments:

**Questions for Your Facility [(FORD MOTOR COMPANY-STERLING I PLANT) (TRIFID: 48310FRDMT39000)]  
Regarding Toxics Release Inventory (TRI) Submissions - Due April 29, 2022**

Dear ADAM ALBRIGHT and JACQUELINE WALKER:

This email is an reminder to EPA email dated March 7, 2022 about data quality questions for your facility for reporting year(s) 2020. EPA has NOT received your web response yet. ***Please send your web response ASAP.***

**How do I respond to this inquiry?**

**Step 1:**

Please respond by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=dcf836d9-2858-4306-bcad-9e9833200eb3&target=bc9002dd-6258-4052-a782-cd274c14a5e4>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

**Step 2:**

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Kushal Som at som.kushal@epa.gov.

Thank you for your attention to this matter.

Sincerely,

Kushal Som

77 West Jackson Boulevard CHICAGO, IL 60604

**Email sent on 04/08/2022 12:14pm**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

77 West Jackson Boulevard CHICAGO, IL 60604

**Toxics Release Inventory (TRI) Data Quality Questions [(FORD MOTOR COMPANY-STERLING I PLANT) (TRIFID: 48310FRDMT39000)] Form R for Reporting Year 2020 - Due April 29, 2022**

Fri Apr 08 12:11:30 UTC 2022

Dear ADAM ALBRIGHT and JACQUELINE WALKER:

This EPA data quality check EPA is a follow-up to your Toxics Release Inventory (TRI) report for reporting year 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submissions regarding the below observations and make corrections, if necessary.

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by TRI, and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent one hazardous waste shipment totaling 16,797 pounds of listed PFAS chemicals, containing PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for the TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report(s) for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=39321fe2-298a-4217-b08e-81d14a909c26&target=bc9002dd-6258-4052-a782-cd274c14a5e4>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

Step 2:

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete and certify them in your CDX reporting account by April 29, 2022.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Kushal Som at [som.kushal@epa.gov](mailto:som.kushal@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Kushal Som

**EPA Email – OG-3**

Region 5 Email

04/26/2022 11:04am

From: *Kushal Som*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To               | E-Mail Address   |
|-----------------------|--|
| Self: Kushal Som      | <a href="mailto:som.kushal@epa.gov">som.kushal@epa.gov</a> |
| To: JACQUELINE WALKER | <a href="mailto:JWALKER6@FORD.COM">JWALKER6@FORD.COM</a>   |
| To: ADAM ALBRIGHT     | <a href="mailto:AALBRIG2@FORD.COM">AALBRIG2@FORD.COM</a>   |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Region 5

77 West Jackson Boulevard CHICAGO, IL 60604

Tue Apr 26 15:04:26 UTC 2022

Dear ADAM ALBRIGHT and JACQUELINE WALKER:

EPA would like to inform you that data quality issues raised for your facility [FORD MOTOR COMPANY-STERLING I PLANT (TRIFID: 48310FRDMT39000)] during reporting year 2020 Adhoc Data Quality Checks are resolved.

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Kushal Som

TRI Data Quality Program

US EPA

Region 5

Email sent on 04/26/2022 12:41pm

FORD MOTOR COMPANY-STERLING I PLANT - 48310FRDMT39000 submitted a web response on Apr 26, 2022 12:40:29 PM. A PDF copy of the web response is attached.

### Facility Response – IC-1

Subject: Facility Response Form

Apr 26, 2022 12:40:29 PM

From: Adam Albright

(313) 805-9419 aalbrig2@ford.com

Contractor Company Name: Ford Motor Company

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

PFAS-NOT-F RY 2020

The source of these releases and quantities are listed below:

| Response            |   | Reporting Year<br>(if applicable) |
|---------------------|---|-----------------------------------|
| No Change           |   |                                   |
| Reason for Response | The waste in question was generated in 2019 by the Sterling Hts Fire Department when extinguishing a fire using the PFAS/PFOA containing foam. The waste was sent out in 2020, but not generated in 2020. Since the chemicals in question were not TRI-listed in 2019 or "used" in 2020, it would not have triggered the threshold for TRI reporting in 2020. |                                   |

.....

**THE DOW CHEMICAL CO (48667THDWCMICHI)  
1790 BUILDING, MIDLAND, MI 48667 (Region 5)**

**EPA Email – OG-1**

Region 5 Email

08/16/2021 07:10am

From: *Kushal Som*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(THE DOW CHEMICAL CO) (TRIFID: 48667THDWCMICHI)] Form R for Reporting Year(s) 2020 - Due September 10, 2021

| Sent To              | E-Mail Address     |
|----------------------|--------------------|
| Self: Kushal Som     | som.kushal@epa.gov |
| To: HEATHER GALLEGOS | HLGALLEGOS@DOW.COM |
| To: HARRY A SMITH    | HASMITH@DOW.COM    |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

77 West Jackson Boulevard CHICAGO, IL 60604

**Toxics Release Inventory (TRI) Data Quality Questions [(THE DOW CHEMICAL CO) (TRIFID: 48667THDWCMICHI)]  
Form R for Reporting Year 2020 - Due September 1, 2021**

Mon Aug 16 11:09:37 EDT 2021

Dear HEATHER GALLEGOS and HARRY A SMITH:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Silicic acid (H<sub>4</sub>SiO<sub>4</sub>), disodium salt, reaction products with chlorotrimethylsilane and 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10- heptadecafluoro-1-decanol submitted to EPA from your facility: *THE DOW CHEMICAL CO*) - (TRIFID: 48667THDWCMICHI) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Silicic acid (H<sub>4</sub>SiO<sub>4</sub>), disodium salt, reaction products with chlorotrimethylsilane and 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10- heptadecafluoro-1-decanol to TRI for reporting year 2020, but might have reported for Silicic acid (H<sub>4</sub>SiO<sub>4</sub>), disodium salt, reaction products with chlorotrimethylsilane and 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10- heptadecafluoro-1-decanol to 2020 CDR as manufactured / imported. Please review and submit new report for Silicic acid (H<sub>4</sub>SiO<sub>4</sub>), disodium salt, reaction products with chlorotrimethylsilane and 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10- heptadecafluoro-1-decanol for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=70f88bf7-6dee-470d-bfd1-570c90f426c8&target=f652290f-23d6-4835-8819-feb387c58be5>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by September 1, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Kushal Som at [som.kushal@epa.gov](mailto:som.kushal@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Kushal Som

## EPA Email – OG-2

Headquarters Email

09/12/2021 11:48am

From: *Velu Senthil*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To                | E-Mail Address     |
|------------------------|--------------------|
| Cc: som.kushal@epa.gov | som.kushal@epa.gov |
| To: HEATHER GALLEGOS   | HLGALLEGOS@DOW.COM |
| To: HARRY A SMITH      | HASMITH@DOW.COM    |

Attachments:

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

Sun Sep 12 15:48:08 EDT 2021

Dear HEATHER GALLEGOS and HARRY A SMITH:

EPA would like to inform you that data quality issues raised for your facility [THE DOW CHEMICAL CO (TRIFID: 48667THDWCMICHI)] during reporting year 2020 Adhoc Data Quality Checks cycle are resolved for the following:

#### Reporting Year(s) Chemicals

2020 Silicic acid (H<sub>4</sub>SiO<sub>4</sub>), disodium salt, reaction products with chlorotrimethylsilane and 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10- heptadecafluoro-1-decanol

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Velu Senthil

TRI Data Quality Program

US EPA

Email sent on 08/16/2021 11:46am

THE DOW CHEMICAL CO - 48667THDWCMICHI submitted a web response on Aug 16, 2021 11:45:35 AM. A PDF copy of the web response is attached.

## Facility Response – IC-1

Subject: Facility Response Form

Aug 16, 2021 11:45:35 AM

From: Harry Smith

(198) 926-44641 hasmith@dow.com

Contractor Company Name: The Dow Chemical Company

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

PFAS-NOT RY 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Silicic acid (H4SiO4), disodium salt, reaction products with chlorotrimethylsilane and 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10- heptadecafluoro-1-decanol to TRI for reporting year 2020, but might have reported for Silicic acid (H4SiO4), disodium salt, reaction products with chlorotrimethylsilane and 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10- heptadecafluoro-1-decanol to 2020 CDR as manufactured / imported. Please review and submit new report for Silicic acid (H4SiO4), disodium salt, reaction products with chlorotrimethylsilane and 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10- heptadecafluoro-1-decanol for reporting year 2020, if required.

The source of these releases and quantities are listed below:

| Reported Chemical  | Reporting Year (if Response applicable)  |
|--|--|
| Silicic acid (H4SiO4), disodium salt, reaction products with chlorotrimethylsilane and 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10- heptadecafluoro-1-decanol | No Change  |
| Reason for Response  | Production of this compound ceased at the Midland site several years ago, and it is no longer used here. |

.....

# TYCO FIRE PRODUCTS LP (54143NSLFRONEST) 1 STANTON ST, MARINETTE, WI 54143 (Region 5)

## EPA Email – OG-1

Headquarters Email

07/25/2021 03:23pm

From: *Velu Senthil*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(TYCO FIRE PRODUCTS LP) (TRIFID: 54143NSLFRONEST)] for RY 2020 - Due September 10, 2021

| Sent To             | E-Mail Address       |
|---------------------|----------------------|
| To: JOSEPH JANECZEK | JJANECZEK@TYCO.COM   |
| To: RYAN SUENNEN    | RYAN.SUENNEN@JCI.COM |

Attachments:

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

### Toxics Release Inventory (TRI) Data Quality Questions [(TYCO FIRE PRODUCTS LP) (TRIFID: 54143NSLFRONEST)] Form R for Reporting Year(s) 2020 - Due September 10, 2021

Sun Jul 25 19:23:29 EDT 2021

Dear RYAN SUENNEN and JOSEPH JANECZEK:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for 1-Propanaminium, 2-hydroxy-N,N,N-trimethyl-, 3-[(γ-ω-perfluoro-C6-20-alkyl)thio] derivs., chlorides, 1-Propanaminium, 3-amino-N-(carboxymethyl)-N,N-dimethyl-, N-[2-[(γ-ω-perfluoro-C4-20-alkyl)thio]acetyl] derivs., inner salts, 1-Propanesulfonic acid, 2-methyl-, 2-[[1-oxo-3-[(γ-ω-perfluoro-C4-16-alkyl)thio]propyl]amino] derivs., sodium salts, Ethanol, 2,2'-iminobis-, compd. with α-fluoro-ω-[2-(phosphonoxy)ethyl]poly(difluoromethylene) (1:1), Poly(difluoromethylene), α-fluoro-ω-[2-(phosphonoxy)ethyl]-, monoammonium salt, Poly(oxy-1,2-ethanediyl), α-hydro-ω-hydroxy-, ether with α-fluoro-ω-(2-hydroxyethyl)poly(difluoromethylene) (1:1), Thiols, C4-10, γ-ω-perfluoro, Thiols, C6-12, γ-ω-perfluoro and Thiols, C8-20, γ-ω-perfluoro, telomers with acrylamide submitted to EPA from your**

**facility [(Name: TYCO FIRE PRODUCTS LP) - (TRIFID: 54143NSLFRONEST)] for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Thiols, C4-10, γ-ω-perfluoro to TRI for reporting year 2020, but might have reported for Thiols, C4-10, γ-ω-perfluoro to 2020 CDR as manufactured / imported. Please review and submit new report for Thiols, C4-10, γ-ω-perfluoro for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for 1-Propanesulfonic acid, 2-methyl-, 2-[[1-oxo-3-[(γ-ω-perfluoro-C4-16-alkyl)thio]propyl]amino] derivs., sodium salts to TRI for reporting year 2020, but might have reported for 1-Propanesulfonic acid, 2-methyl-, 2-[[1-oxo-3-[(γ-ω-perfluoro-C4-16-alkyl)thio]propyl]amino] derivs., sodium salts to 2020 CDR as manufactured / imported. Please review and submit new report for 1-Propanesulfonic acid, 2-methyl-, 2-[[1-oxo-3-[(γ-ω-perfluoro-C4-16-alkyl)thio]propyl]amino] derivs., sodium salts for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for 1-Propanaminium, 3-amino-N-(carboxymethyl)-N,N-dimethyl-, N-[2-[(γ-ω-perfluoro-C4-20-alkyl)thio]acetyl] derivs., inner salts to TRI for reporting year 2020, but might have reported for 1-Propanaminium, 3-amino-N-(carboxymethyl)-N,N-dimethyl-, N-[2-[(γ-ω-perfluoro-C4-20-alkyl)thio]acetyl] derivs., inner salts to 2020 CDR as manufactured / imported. Please review and submit new report for 1-Propanaminium, 3-amino-N-(carboxymethyl)-N,N-dimethyl-, N-[2-[(γ-ω-perfluoro-C4-20-alkyl)thio]acetyl] derivs., inner salts for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Thiols, C8-20, γ-ω-perfluoro, telomers with acrylamide to TRI for reporting year 2020, but might have reported for Thiols, C8-20, γ-ω-perfluoro, telomers with acrylamide to 2020 CDR as manufactured / imported. Please review and submit new report for Thiols, C8-20, γ-ω-perfluoro, telomers with acrylamide for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Thiols, C6-12, γ-ω-perfluoro to TRI for reporting year 2020, but might have reported for Thiols, C6-12, γ-ω-perfluoro to 2020 CDR as manufactured / imported. Please review and submit new report for Thiols, C6-12, γ-ω-perfluoro for reporting year 2020, if required.

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Poly(difluoromethylene),  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]-, monoammonium salt to TRI for reporting year 2020, but might have reported for Poly(difluoromethylene),  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]-, monoammonium salt to 2020 CDR as manufactured / imported. Please review and submit new report for Poly(difluoromethylene),  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]-, monoammonium salt for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (1:1) to TRI for reporting year 2020, but might have reported for Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (1:1) to 2020 CDR as manufactured / imported. Please review and submit new report for Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (1:1) for reporting year 2020, if required.
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***How do I respond to this inquiry?***

***Step 1:***

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=4046e1f3-2c5b-445e-a093-34ee1dfdc13c&target=c1f9e3e3-134a-4b7b-a5e6-e734ba5df6fb>

***If you indicate new submission, revision or withdrawal in web response questionnaire, please proceed to step 2.***

Step 2:

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If you would like to make any revisions, withdrawals or new submissions, **please send them to EPA by September 10, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have any follow up questions, please contact Velu Senthil at (202) 566-0749 or email at [senthil.velu@epa.gov](mailto:senthil.velu@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Velu Senthil

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

#### **EPA Email – OG-2**

Headquarters Email

08/19/2021 08:47am

From: *Velu Senthil*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(TYCO FIRE PRODUCTS LP) (TRIFID: 54143NSLFRONEST)] Form R for Reporting Year(s) 2020 - Due September 10, 2021

| Sent To           | E-Mail Address   |
|-------------------|--|
| To: Thomas Estock | <a href="mailto:thomas.estock@jci.com">thomas.estock@jci.com</a> |
| To: RYAN SUENNEN  | <a href="mailto:RYAN.SUENNEN@JCI.COM">RYAN.SUENNEN@JCI.COM</a>   |

Attachments:

**Questions for Your Facility [(TYCO FIRE PRODUCTS LP) (TRIFID: 54143NSLFRONEST)] Regarding Toxics Release Inventory (TRI) Submissions - Due September 10, 2021**

Dear Thomas Estock and RYAN SUENNEN:

This email is an reminder to EPA email(s) dated July 25, 2021 about data quality questions for your facility for reporting year(s) 2020. EPA has NOT received your web response yet. ***Please send your web response ASAP.***

**How do I respond to this inquiry?**

**Step 1:**

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=70f62003-4dfa-4301-9e86-4bd01e7e5c2d&target=c1f9e3e3-134a-4b7b-a5e6-e734ba5df6fb>

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If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by September 10, 2021.**

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Thank you for your attention to this matter.

Sincerely,

Velu Senthill

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

**Email sent on 07/25/2021 07:23pm**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

**Toxics Release Inventory (TRI) Data Quality Questions [(TYCO FIRE PRODUCTS LP) (TRIFID: 54143NSLFRONEST)]  
Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Sun Jul 25 19:23:29 EDT 2021

Dear RYAN SUENNEN and JOSEPH JANECEK:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for 1-Propanaminium, 2-hydroxy-N,N,N-trimethyl-, 3-[(γ-ω-perfluoro-C6-20-alkyl)thio] derivs., chlorides, 1-Propanaminium, 3-amino-N-(carboxymethyl)-N,N-dimethyl-, N-[2-[(γ-ω-perfluoro-C4-20-alkyl)thio]acetyl] derivs., inner salts, 1-Propanesulfonic acid, 2-methyl-, 2-[[1-oxo-3-[(γ-ω-perfluoro-C4-16-alkyl)thio]propyl]amino] derivs., sodium salts, Ethanol, 2,2'-iminobis-, compd. with α-fluoro-ω-[2-(phosphonooxy)ethyl]poly(difluoromethylene) (1:1), Poly(difluoromethylene), α-fluoro-ω-[2-(phosphonooxy)ethyl]-, monoammonium salt, Poly(oxy-1,2-ethanediyl), α-hydro-ω-hydroxy-, ether with α-fluoro-ω-(2-hydroxyethyl)poly(difluoromethylene) (1:1), Thiols, C4-10, γ-ω-perfluoro, Thiols, C6-12, γ-ω-perfluoro and Thiols, C8-20, γ-ω-perfluoro, telomers with acrylamide submitted to EPA from your facility [(Name: TYCO FIRE PRODUCTS LP) - (TRIFID: 54143NSLFRONEST)] for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Thiols, C4-10, γ-ω-perfluoro to TRI for reporting year 2020, but might have reported for Thiols, C4-10, γ-ω-perfluoro to 2020 CDR as manufactured / imported. Please review and submit new report for Thiols, C4-10, γ-ω-perfluoro for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for 1-Propanesulfonic acid, 2-methyl-, 2-[[1-oxo-3-[(γ-ω-perfluoro-C4-16-alkyl)thio]propyl]amino] derivs., sodium salts to TRI for reporting year 2020, but might have reported for 1-Propanesulfonic acid, 2-methyl-, 2-[[1-oxo-3-[(γ-ω-perfluoro-C4-16-alkyl)thio]propyl]amino] derivs., sodium salts to 2020 CDR as manufactured / imported. Please review and submit new report for 1-Propanesulfonic acid, 2-methyl-, 2-[[1-oxo-3-[(γ-ω-perfluoro-C4-16-alkyl)thio]propyl]amino] derivs., sodium salts for reporting year 2020, if required.
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and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for 1-Propanaminium, 3-amino-N-(carboxymethyl)-N,N-dimethyl-, N-[2-[(γ-ω-perfluoro-C4-20-alkyl)thio]acetyl] derivs., inner salts to TRI for reporting year 2020, but might have reported for 1-Propanaminium, 3-amino-N-(carboxymethyl)-N,N-dimethyl-, N-[2-[(γ-ω-perfluoro-C4-20-alkyl)thio]acetyl] derivs., inner salts to 2020 CDR as manufactured / imported. Please review and submit new report for 1-Propanaminium, 3-amino-N-(carboxymethyl)-N,N-dimethyl-, N-[2-[(γ-ω-perfluoro-C4-20-alkyl)thio]acetyl] derivs., inner salts for reporting year 2020, if required.

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***How do I respond to this inquiry?***

***Step 1:***

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Thank you for your attention to this matter.

Sincerely,

Velu Senthil

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

**EPA Email – OG-3**

Headquarters Email

09/02/2021 05:55am

From: *Velu Senthil*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(TYCO FIRE PRODUCTS LP) (TRIFID: 54143NSLFRONEST)] Form R for Reporting Year(s) 2020 - Due September 10, 2021

| Sent To           | E-Mail Address        |
|-------------------|-----------------------|
| To: Thomas Estock | thomas.estock@jci.com |
| To: RYAN SUENNEN  | RYAN.SUENNEN@JCI.COM  |

Attachments:

**Questions for Your Facility [(TYCO FIRE PRODUCTS LP) (TRIFID: 54143NSLFRONEST)] Regarding Toxics Release Inventory (TRI) Submissions - Due September 10, 2021**

Dear Thomas Estock and RYAN SUENNEN:

This email is an reminder to EPA email(s) dated August 19, 2021 and July 25, 2021 about data quality questions for your facility for reporting year(s) 2020. EPA has NOT received your web response yet. ***Please send your web response ASAP.***

**How do I respond to this inquiry?**

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Thank you for your attention to this matter.

Sincerely,

Velu Senthil

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

**Email sent on 08/19/2021 12:47pm**

**Questions for Your Facility [(TYCO FIRE PRODUCTS LP) (TRIFID: 54143NSLFRONEST)] Regarding Toxics Release Inventory (TRI) Submissions - Due September 10, 2021**

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***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

**Step 2:**

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If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by September 10, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Velu Senthil at [senthil.velu@epa.gov](mailto:senthil.velu@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Velu Senthil

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

**Email sent on 07/25/2021 07:23pm**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

**Toxics Release Inventory (TRI) Data Quality Questions [(TYCO FIRE PRODUCTS LP) (TRIFID: 54143NSLFRONEST)]  
Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Sun Jul 25 19:23:29 EDT 2021

Dear RYAN SUENNEN and JOSEPH JANECEK:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for 1-Propanaminium, 2-hydroxy-N,N,N-trimethyl-, 3-[(γ-ω-perfluoro-C6-20-alkyl)thio] derivs., chlorides, 1-Propanaminium, 3-amino-N-(carboxymethyl)-N,N-dimethyl-, N-[2-[(γ-ω-perfluoro-C4-20-alkyl)thio]acetyl] derivs., inner salts, 1-Propanesulfonic acid, 2-methyl-, 2-[[1-oxo-3-[(γ-ω-perfluoro-C4-16-alkyl)thio]propyl]amino] derivs., sodium salts, Ethanol, 2,2'-iminobis-, compd. with α-fluoro-ω-[2-(phosphonoxy)ethyl]poly(difluoromethylene) (1:1), Poly(difluoromethylene), α-fluoro-ω-[2-(phosphonoxy)ethyl]-, monoammonium salt, Poly(oxy-1,2-ethanediyl), α-hydro-ω-hydroxy-, ether with α-fluoro-ω-(2-hydroxyethyl)poly(difluoromethylene) (1:1), Thiols, C4-10, γ-ω-perfluoro, Thiols, C6-12, γ-ω-perfluoro and Thiols, C8-20, γ-ω-perfluoro, telomers with acrylamide submitted to EPA from your facility [(Name: TYCO FIRE PRODUCTS LP) - (TRIFID: 54143NSLFRONEST)] for reporting year(s) 2020 has been identified for follow-up due to the following:**

## Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Thiols, C4-10, γ-ω-perfluoro to TRI for reporting year 2020, but might have reported for Thiols, C4-10, γ-ω-perfluoro to 2020 CDR as manufactured / imported. Please review and submit new report for Thiols, C4-10, γ-ω-perfluoro for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for 1-Propanesulfonic acid, 2-methyl-, 2-[[1-oxo-3-[(γ-ω-perfluoro-C4-16-alkyl)thio]propyl]amino] derivs., sodium salts to TRI for reporting year 2020, but might have reported for 1-Propanesulfonic acid, 2-methyl-, 2-[[1-oxo-3-[(γ-ω-perfluoro-C4-16-alkyl)thio]propyl]amino] derivs., sodium salts to 2020 CDR as manufactured / imported. Please review and submit new report for 1-Propanesulfonic acid, 2-methyl-, 2-[[1-oxo-3-[(γ-ω-perfluoro-C4-16-alkyl)thio]propyl]amino] derivs., sodium salts for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for 1-Propanaminium, 3-amino-N-(carboxymethyl)-N,N-dimethyl-, N-[2-[(γ-ω-perfluoro-C4-20-alkyl)thio]acetyl] derivs., inner salts to TRI for reporting year 2020, but might have reported for 1-Propanaminium, 3-amino-N-(carboxymethyl)-N,N-dimethyl-, N-[2-[(γ-ω-perfluoro-C4-20-alkyl)thio]acetyl] derivs., inner salts to 2020 CDR as manufactured / imported. Please review and submit new report for 1-Propanaminium, 3-amino-N-(carboxymethyl)-N,N-dimethyl-, N-[2-[(γ-ω-perfluoro-C4-20-alkyl)thio]acetyl] derivs., inner salts for reporting year 2020, if required.
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- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)

cbi\_pfas\_list\_1\_8\_2021\_final.pdf) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Poly(difluoromethylene),  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]-, monoammonium salt to TRI for reporting year 2020, but might have reported for Poly(difluoromethylene),  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]-, monoammonium salt to 2020 CDR as manufactured / imported. Please review and submit new report for Poly(difluoromethylene),  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]-, monoammonium salt for reporting year 2020, if required.

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (1:1) to TRI for reporting year 2020, but might have reported for Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (1:1) to 2020 CDR as manufactured / imported. Please review and submit new report for Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (1:1) for reporting year 2020, if required.
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### ***How do I respond to this inquiry?***

#### ***Step 1:***

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=4046e1f3-2c5b-445e-a093-34ee1dfdc13c&target=c1f9e3e3-134a-4b7b-a5e6-e734ba5df6fb>

***If you indicate new submission, revision or withdrawal in web response questionnaire, please proceed to step 2.***

#### ***Step 2:***

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If you would like to make any revisions, withdrawals or new submissions, **please send them to EPA by September 10, 2021.**

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If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have any follow up questions, please contact Velu Senthil at (202) 566-0749 or email at [senthil.velu@epa.gov](mailto:senthil.velu@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Velu Senthil

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

#### **EPA Email – OG-4**

Headquarters Email

09/09/2021 01:04pm

From: *Velu Senthil*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To           | E-Mail Address   |
|-------------------|--|
| To: Thomas Estock | <a href="mailto:thomas.estock@jci.com">thomas.estock@jci.com</a> |
| To: RYAN SUENNEN  | <a href="mailto:RYAN.SUENNEN@JCI.COM">RYAN.SUENNEN@JCI.COM</a>   |

Attachments:

#### **UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

Thu Sep 09 17:04:16 EDT 2021

Dear Thomas Estock and RYAN SUENNEN:

EPA would like to inform you that data quality issues raised for your facility [TYCO FIRE PRODUCTS LP (TRIFID: 54143NSLFRONEST)] during reporting year 2020 Adhoc Data Quality Checks cycle are resolved for the following:

Reporting Year(s) Chemicals

2020 1-Propanaminium, 2-hydroxy-N,N,N-trimethyl-, 3-[( $\gamma$ - $\omega$ -perfluoro-C6-20-alkyl)thio] derivs., chlorides, 1-Propanaminium, 3-amino-N-(carboxymethyl)-N,N-dimethyl-, N-[2-[( $\gamma$ - $\omega$ -perfluoro-C4-20-alkyl)thio]acetyl] derivs., inner salts, 1-Propanesulfonic acid, 2-methyl-, 2-[[1-oxo-3-[( $\gamma$ - $\omega$ -perfluoro-C4-16-alkyl)thio]propyl]amino] derivs., sodium salts, Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (1:1), Poly(difluoromethylene),  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]-, monoammonium salt, Poly(oxy-1,2-ethanediyl),  $\alpha$ -hydro- $\omega$ -hydroxy-, ether with  $\alpha$ -fluoro- $\omega$ -(2-hydroxyethyl)poly(difluoromethylene) (1:1), Thiols, C4-10,  $\gamma$ - $\omega$ -perfluoro, Thiols, C6-12,  $\gamma$ - $\omega$ -perfluoro and Thiols, C8-20,  $\gamma$ - $\omega$ -perfluoro, telomers with acrylamide

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Velu Senthil

TRI Data Quality Program

US EPA

**Email sent on 09/02/2021 09:55am**

**Questions for Your Facility [(TYCO FIRE PRODUCTS LP) (TRIFID: 54143NSLFRONEST)] Regarding Toxics Release Inventory (TRI) Submissions - Due September 10, 2021**

Dear Thomas Estock and RYAN SUENNEN:

This email is an reminder to EPA email(s) dated August 19, 2021 and July 25, 2021 about data quality questions for your facility for reporting year(s) 2020. EPA has NOT received your web response yet. ***Please send your web response ASAP.***

**How do I respond to this inquiry?**

**Step 1:**

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=4c0e8115-3926-4656-8194-5eb36a2ce067&target=c1f9e3e3-134a-4b7b-a5e6-e734ba5df6fb>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

**Step 2:**

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If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by September 10, 2021.**

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Thank you for your attention to this matter.

Sincerely,

Velu Senthil

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

**Email sent on 08/19/2021 12:47pm**

**Questions for Your Facility [(TYCO FIRE PRODUCTS LP) (TRIFID: 54143NSLFRONEST)] Regarding Toxics Release Inventory (TRI) Submissions - Due September 10, 2021**

Dear Thomas Estock and RYAN SUENNEN:

This email is an reminder to EPA email(s) dated July 25, 2021 about data quality questions for your facility for reporting year(s) 2020. EPA has NOT received your web response yet. ***Please send your web response ASAP.***

**How do I respond to this inquiry?**

**Step 1:**

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=70f62003-4dfa-4301-9e86-4bd01e7e5c2d&target=c1f9e3e3-134a-4b7b-a5e6-e734ba5df6fb>

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If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by September 10, 2021.**

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Thank you for your attention to this matter.

Sincerely,

Velu Senthil

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

**Email sent on 07/25/2021 07:23pm**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

**Toxics Release Inventory (TRI) Data Quality Questions [(TYCO FIRE PRODUCTS LP) (TRIFID: 54143NSLFRONEST)]  
Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Sun Jul 25 19:23:29 EDT 2021

Dear RYAN SUENNEN and JOSEPH JANECZEK:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for 1-Propanaminium, 2-hydroxy-N,N,N-trimethyl-, 3-[(γ-ω-perfluoro-C6-20-alkyl)thio] derivs., chlorides, 1-Propanaminium, 3-amino-N-(carboxymethyl)-N,N-dimethyl-, N-[2-[(γ-ω-perfluoro-C4-20-**

alkyl)thio]acetyl] derivs., inner salts, 1-Propanesulfonic acid, 2-methyl-, 2-[[1-oxo-3-[(γ-ω-perfluoro-C4-16-alkyl)thio]propyl]amino] derivs., sodium salts, Ethanol, 2,2'-iminobis-, compd. with α-fluoro-ω-[2-(phosphonoxy)ethyl]poly(difluoromethylene) (1:1), Poly(difluoromethylene), α-fluoro-ω-[2-(phosphonoxy)ethyl]-, monoammonium salt, Poly(oxy-1,2-ethanediyl), α-hydro-ω-hydroxy-, ether with α-fluoro-ω-(2-hydroxyethyl)poly(difluoromethylene) (1:1), Thiols, C4-10, γ-ω-perfluoro, Thiols, C6-12, γ-ω-perfluoro and Thiols, C8-20, γ-ω-perfluoro, telomers with acrylamide submitted to EPA from your facility [(Name: *TYCO FIRE PRODUCTS LP*) - (TRIFID: *54143NSLFRONEST*)] for reporting year(s) 2020 has been identified for follow-up due to the following:

#### Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Thiols, C4-10, γ-ω-perfluoro to TRI for reporting year 2020, but might have reported for Thiols, C4-10, γ-ω-perfluoro to 2020 CDR as manufactured / imported. Please review and submit new report for Thiols, C4-10, γ-ω-perfluoro for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for 1-Propanesulfonic acid, 2-methyl-, 2-[[1-oxo-3-[(γ-ω-perfluoro-C4-16-alkyl)thio]propyl]amino] derivs., sodium salts to TRI for reporting year 2020, but might have reported for 1-Propanesulfonic acid, 2-methyl-, 2-[[1-oxo-3-[(γ-ω-perfluoro-C4-16-alkyl)thio]propyl]amino] derivs., sodium salts to 2020 CDR as manufactured / imported. Please review and submit new report for 1-Propanesulfonic acid, 2-methyl-, 2-[[1-oxo-3-[(γ-ω-perfluoro-C4-16-alkyl)thio]propyl]amino] derivs., sodium salts for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for 1-Propanaminium, 3-amino-N-(carboxymethyl)-N,N-dimethyl-, N-[2-[(γ-ω-perfluoro-C4-20-alkyl)thio]acetyl] derivs., inner salts to TRI for reporting year 2020, but might have reported for 1-Propanaminium, 3-amino-N-(carboxymethyl)-N,N-dimethyl-, N-[2-[(γ-ω-perfluoro-C4-20-alkyl)thio]acetyl] derivs., inner salts to 2020 CDR as manufactured / imported. Please review and submit new report for 1-Propanaminium, 3-amino-N-(carboxymethyl)-N,N-dimethyl-, N-[2-[(γ-ω-perfluoro-C4-20-alkyl)thio]acetyl] derivs., inner salts for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Thiols, C8-20, γ-ω-perfluoro, telomers with acrylamide to TRI for reporting year 2020, but might have reported for Thiols, C8-20, γ-ω-perfluoro, telomers with acrylamide to 2020 CDR as manufactured / imported. Please review and submit new report for Thiols, C8-20, γ-ω-perfluoro, telomers with acrylamide for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS)

([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Thiols, C6-12, γ-ω-perfluoro to TRI for reporting year 2020, but might have reported for Thiols, C6-12, γ-ω-perfluoro to 2020 CDR as manufactured / imported. Please review and submit new report for Thiols, C6-12, γ-ω-perfluoro for reporting year 2020, if required.

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Poly(difluoromethylene), α-fluoro-ω-[2-(phosphonooxy)ethyl]-, monoammonium salt to TRI for reporting year 2020, but might have reported for Poly(difluoromethylene), α-fluoro-ω-[2-(phosphonooxy)ethyl]-, monoammonium salt to 2020 CDR as manufactured / imported. Please review and submit new report for Poly(difluoromethylene), α-fluoro-ω-[2-(phosphonooxy)ethyl]-, monoammonium salt for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Ethanol, 2,2'-iminobis-, compd. with α-fluoro-ω-[2-(phosphonooxy)ethyl]poly(difluoromethylene) (1:1) to TRI for reporting year 2020, but might have reported for Ethanol, 2,2'-iminobis-, compd. with α-fluoro-ω-[2-(phosphonooxy)ethyl]poly(difluoromethylene) (1:1) to 2020 CDR as manufactured / imported. Please review and submit new report for Ethanol, 2,2'-iminobis-, compd. with α-fluoro-ω-[2-(phosphonooxy)ethyl]poly(difluoromethylene) (1:1) for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Poly(oxy-1,2-ethanediyl), α-hydro-ω-hydroxy-, ether with α-fluoro-ω-(2-hydroxyethyl)poly(difluoromethylene) (1:1) to TRI for reporting year 2020, but might have reported for Poly(oxy-1,2-ethanediyl), α-hydro-ω-hydroxy-, ether with α-fluoro-ω-(2-hydroxyethyl)poly(difluoromethylene) (1:1) to 2020 CDR as manufactured / imported. Please review and submit new report for Poly(oxy-1,2-ethanediyl), α-hydro-ω-hydroxy-, ether with α-fluoro-ω-(2-hydroxyethyl)poly(difluoromethylene) (1:1) for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for 1-Propanaminium, 2-hydroxy-N,N,N-trimethyl-, 3-[(γ-ω-perfluoro-C6-20-alkyl)thio] derivs., chlorides to TRI for reporting year 2020, but might have reported for 1-Propanaminium, 2-hydroxy-N,N,N-trimethyl-, 3-[(γ-ω-perfluoro-C6-20-alkyl)thio] derivs., chlorides to 2020 CDR as manufactured / imported. Please review and submit new report for 1-Propanaminium, 2-hydroxy-N,N,N-trimethyl-, 3-[(γ-ω-perfluoro-C6-20-alkyl)thio] derivs., chlorides for reporting year 2020, if required.

### ***How do I respond to this inquiry?***

#### ***Step 1:***

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=4046e1f3-2c5b-445e-a093-34ee1dfdc13c&target=c1f9e3e3-134a-4b7b-a5e6-e734ba5df6fb>

***If you indicate new submission, revision or withdrawal in web response questionnaire, please proceed to step 2.***

*Step 2:*

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you would like to make any revisions, withdrawals or new submissions, **please send them to EPA by September 10, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have any follow up questions, please contact Velu Senthil at (202) 566-0749 or email at [senthil.velu@epa.gov](mailto:senthil.velu@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Velu Senthil

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

\*\*\*\*\*

**LSC COMMUNICATIONS / MATTOON (61938RRDNNROUTE)  
6821 E COUNTY RD 1100 N, MATTOON, IL 61938 (Region 5)**

**EPA Email – OG-1**

Region 5 Email

04/08/2022 02:42pm

From: *Kushal Som*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(LSC COMMUNICATIONS / MATTOON) (TRIFID: 61938RRDNNROUTE)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To            | E-Mail Address              |
|--------------------|-----------------------------|
| Self: Kushal Som   | som.kushal@epa.gov          |
| To: STACEY HAEFNER | STACEY.L.HAEFNER@LSCCOM.COM |
| To: STACEY HAEFNER | STACEY.L.HAEFNER@LSCCOM.COM |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

77 West Jackson Boulevard CHICAGO, IL 60604

**Toxics Release Inventory (TRI) Data Quality Questions [(LSC COMMUNICATIONS / MATTOON) (TRIFID: 61938RRDNNROUTE)] Form R for Reporting Year 2020 -**

**Due April 29, 2022**

Fri Apr 08 18:40:41 UTC 2022

Dear STACEY HAEFNER:

This EPA data quality check EPA is a follow-up to your Toxics Release Inventory (TRI) report for reporting year 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submissions regarding the below observations and make corrections, if necessary.

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI),

and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent two hazardous waste shipments totaling 9,873 pounds containing PFAS (specifically PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm), but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report(s) for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=26091c0f-515a-4772-9d70-894c590c7207&target=9f3f06fd-796c-4e99-b660-43f61d0d684c>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete and certify them in your CDX reporting account by April 29, 2022.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Kushal Som at [som.kushal@epa.gov](mailto:som.kushal@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Kushal Som

**EPA Email – OG-2**

Region 5 Email

04/26/2022 06:56am

From: *Kushal Som*

Subject: Questions for Your Facility [(LSC COMMUNICATIONS / MATTOON) (TRIFID: 61938RRDNNROUTE)]  
Regarding Toxics Release Inventory (TRI) Submissions - Due April 29, 2022

| Sent To            | E-Mail Address              |
|--------------------|-----------------------------|
| Self: Kushal Som   | som.kushal@epa.gov          |
| To: STACEY HAEFNER | STACEY.L.HAEFNER@LSCCOM.COM |
| To: STACEY HAEFNER | STACEY.L.HAEFNER@LSCCOM.COM |

Attachments:

**Questions for Your Facility [(LSC COMMUNICATIONS / MATTOON) (TRIFID: 61938RRDNNROUTE)] Regarding Toxics Release Inventory (TRI) Submissions - Due April 29, 2022**

Dear STACEY HAEFNER:

This email is an reminder to EPA email dated March 7, 2022 about data quality questions for your facility for reporting year(s) 2020. EPA has NOT received your web response yet. ***Please send your web response ASAP.***

**How do I respond to this inquiry?**

**Step 1:**

Please respond by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=0b6cea87-bbf3-49c1-a4b7-99a2b47dd3cd&target=9f3f06fd-796c-4e99-b660-43f61d0d684c>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

**Step 2:**

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Kushal Som at som.kushal@epa.gov.

Thank you for your attention to this matter.

Sincerely,

Kushal Som

77 West Jackson Boulevard CHICAGO, IL 60604

Email sent on 04/08/2022 06:42pm

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

77 West Jackson Boulevard CHICAGO, IL 60604

**Toxics Release Inventory (TRI) Data Quality Questions [(LSC COMMUNICATIONS / MATTOON) (TRIFID: 61938RRDNNROUTE)] Form R for Reporting Year 2020 -**

**Due April 29, 2022**

Fri Apr 08 18:40:41 UTC 2022

Dear STACEY HAEFNER:

This EPA data quality check EPA is a follow-up to your Toxics Release Inventory (TRI) report for reporting year 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submissions regarding the below observations and make corrections, if necessary.

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent two hazardous waste shipments totaling 9,873 pounds containing PFAS (specifically PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm), but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report(s) for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=26091c0f-515a-4772-9d70-894c590c7207&target=9f3f06fd-796c-4e99-b660-43f61d0d684c>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

*Step 2:*

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete and certify them in your CDX reporting account by April 29, 2022.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Kushal Som at [som.kushal@epa.gov](mailto:som.kushal@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Kushal Som

\*\*\*\*\*

**BUZZI UNICEM USA-CAPE GIRARDEAU (63701LNSTR2524S)  
2524 S SPRIGG ST, CAPE GIRARDEAU, MO 63703 (Region 7)**

**EPA Email – OG-1**

Region 7 Email

08/03/2021 06:32am

From: *Sean Bergin*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(BUZZI UNICEM USA-CAPE GIRARDEAU) (TRIFID: 63701LNSTR2524S)] Form R for Reporting Year(s) 2020 - Due September 10, 2021

| Sent To           | E-Mail Address                   |
|-------------------|----------------------------------|
| Self: Sean Bergin | bergin.sean@epa.gov              |
| To: CRAIG CONKLIN | CRAIG.CONKLIN@BUZZIUNICEMUSA.COM |
| To: SUSAN CARROLL | SUE.CARROLL@BUZZIUNICEMUSA.COM   |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

11201 Renner Boulevard LENEXA, KS 66219

**Toxics Release Inventory (TRI) Data Quality Questions [(BUZZI UNICEM USA-CAPE GIRARDEAU) (TRIFID: 63701LNSTR2524S)] Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Tue Aug 03 10:32:32 EDT 2021

Dear SUSAN CARROLL and CRAIG CONKLIN:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (2:1) submitted to EPA from your facility: BUZZI UNICEM USA-CAPE GIRARDEAU) - (TRIFID: 63701LNSTR2524S) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (2:1) to TRI for reporting year 2020, but might have received Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (2:1) in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment, and also might have reported this chemical, Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (2:1) to 2020 CDR as manufactured / imported. Please review and submit new report for Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (2:1) for reporting year 2020, if required.
- Your facility reported total production waste of 45941035.86 pounds for reporting year 2020; and this quantity is an increase of 13819128.6 pounds compared to your prior reporting year 2019 reported total production waste amount of 32121907.26 pounds. Please review your calculations and submit a revised reports for reporting year 2020, if needed.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=38819b52-337c-4d91-8a95-d77081b6fdae&target=a33334a3-eec3-4675-91e0-edcbee8ba8de>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by September 10, 2021.**

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If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Sean Bergin at [bergin.sean@epa.gov](mailto:bergin.sean@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Sean Bergin

**EPA Email – OG-2**

Headquarters Email

08/09/2021 11:34am

From: *Velu Senthil*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(BUZZI UNICEM USA-CAPE GIRARDEAU) (TRIFID: 63701LNSTR2524S)] Form R for Reporting Year(s) 2020 - Due September 10, 2021

| Sent To                 | E-Mail Address                   |
|-------------------------|----------------------------------|
| Cc: Bergin.Sean@epa.gov | Bergin.Sean@epa.gov              |
| To: CRAIG CONKLIN       | CRAIG.CONKLIN@BUZZIUNICEMUSA.COM |
| To: SUSAN CARROLL       | SUE.CARROLL@BUZZIUNICEMUSA.COM   |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

**Toxics Release Inventory (TRI) Data Quality Questions [(BUZZI UNICEM USA-CAPE GIRARDEAU) (TRIFID: 63701LNSTR2524S)] Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Mon Aug 09 15:24:08 EDT 2021

Dear SUSAN CARROLL and CRAIG CONKLIN:

This email is to acknowledge receipt of your facility's response dated 8/9/21. Your facility indicated in response that "We have reviewed the records from this generator, and have no readily available information indicating we received this material in 2020RY. We will not submit a Form R report for this chemical. " PLAZE INC, MO (TRIFID:63077PLZNC105BO)" reported sending approximately 214 pounds of **α-fluoro-ω-[2-(phosphonoxy)ethyl]poly(difluoromethylene)** to your facility for disposal. The reportable threshold for this chemical is 100 pounds.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (2:1) submitted to EPA from your facility: BUZZI UNICEM USA-CAPE GIRARDEAU) - (TRIFID: 63701LNSTR2524S) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (2:1) to TRI for reporting year 2020, but might have received Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (2:1) in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment, and also might have reported this chemical, Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (2:1) to 2020 CDR as manufactured / imported. Please review and submit new report for Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (2:1) for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

*Step 1:*

Begin by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=16ec9881-591f-4285-acba-f07b102cd37c&target=a33334a3-eec3-4675-91e0-edcbee8ba8de>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

*Step 2:*

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by September 10, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Velu Senthil at [senthil.velu@epa.gov](mailto:senthil.velu@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Velu Senthil

**Email sent on 08/09/2021 08:26am**

**EPA Email – OG-3**

Headquarters Email

09/10/2021 11:10am

From: *Velu Senthil*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To                 | E-Mail Address                   |
|-------------------------|----------------------------------|
| Cc: Bergin.Sean@epa.gov | Bergin.Sean@epa.gov              |
| To: CRAIG CONKLIN       | CRAIG.CONKLIN@BUZZIUNICEMUSA.COM |
| To: SUSAN CARROLL       | SUE.CARROLL@BUZZIUNICEMUSA.COM   |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

Fri Sep 10 15:10:06 EDT 2021

Dear SUSAN CARROLL and CRAIG CONKLIN:

EPA would like to inform you that data quality issues raised for your facility [BUZZI UNICEM USA-CAPE GIRARDEAU (TRIFID: 63701LNSTR2524S)] during reporting year 2020 Adhoc Data Quality Checks cycle are resolved for the following:

Reporting Year(s) Chemicals

2020 Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonoxy)ethyl]poly(difluoromethylene) (2:1)

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Velu Senthil

TRI Data Quality Program

US EPA

Email sent on 08/09/2021 03:34pm

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

**Toxics Release Inventory (TRI) Data Quality Questions [(BUZZI UNICEM USA-CAPE GIRARDEAU) (TRIFID: 63701LNSTR2524S)] Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Mon Aug 09 15:24:08 EDT 2021

Dear SUSAN CARROLL and CRAIG CONKLIN:

This email is to acknowledge receipt of your facility's response dated 8/9/21. Your facility indicated in response that "We have reviewed the records from this generator, and have no readily available information indicating we received this material in 2020RY. We will not submit a Form R report for this chemical. " PLAZE INC, MO (TRIFID:63077PLZNC105BO)" reported sending approximately 214 pounds of  **$\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene)** to your facility for disposal. The reportable threshold for this chemical is 100 pounds.

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**The Form R for Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (2:1) submitted to EPA from your facility: BUZZI UNICEM USA-CAPE GIRARDEAU) - (TRIFID: 63701LNSTR2524S) for reporting year(s) 2020 has been identified for follow-up due to the following:**

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imported. Please review and submit new report for Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonoxy)ethyl]poly(difluoromethylene) (2:1) for reporting year 2020, if required.

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<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=16ec9881-591f-4285-acba-f07b102cd37c&target=a33334a3-ee3-4675-91e0-edcbee8ba8de>

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Thank you for your attention to this matter.

Sincerely,

Velu Senthil

**Email sent on 08/09/2021 08:26am**

**BUZZI UNICEM USA-CAPE GIRARDEAU - 63701LNSTR2524S submitted a web response on Aug 9, 2021 8:25:51 AM. A PDF copy of the web response is attached.**

**Facility Response – IC-1**

Subject: Facility Response Form  
From: Susan Carroll

(573) 335-5591

Aug 9, 2021 8:25:51 AM  
[sue.carroll@buzziunicemusa.com](mailto:sue.carroll@buzziunicemusa.com)

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

INC-W327310-F RY 2020

The source of these releases and quantities are listed below:

| Response            | Reporting Year<br>(if applicable)   |
|---------------------|---|
| No Change           |   |
| Reason for Response | Our facility experienced increased production which resulted in increased waste generation in 2020RY. We will not revise reports. |
| PFAS-NOT RY 2020    |   |

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (2:1) to TRI for reporting year 2020, but might have received Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (2:1) in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment, and also might have reported this chemical, Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (2:1) to 2020 CDR as manufactured / imported. Please review and submit new report for Ethanol, 2,2'-iminobis-, compd. with  $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (2:1) for reporting year 2020, if required.

The source of these releases and quantities are listed below:

| Reported Chemical   | Reporting Year<br>(if applicable)   |
|---|---|
| Ethanol, 2,2'-iminobis-, compd. with $\alpha$ -fluoro- $\omega$ -[2-(phosphonooxy)ethyl]poly(difluoromethylene) (2:1) | No Change   |
| Reason for Response   | We have reviewed the records from this generator, and have no readily available information indicating we received this material in 2020RY. We will not submit a Form R report for this chemical. |

.....

# SOLVENT RECOVERY CORP (64101SLVNT700MU)

700 MULBERRY ST, KANSAS CITY, MO 64101 (Region 7)

## EPA Email – OG-1

Region 7 Email

03/08/2022 05:53am

From: Sean Bergin

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(SOLVENT RECOVERY CORP) (TRIFID: 64101SLVNT700MU)] for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To             | E-Mail Address                 |
|---------------------|--------------------------------|
| Self: Sean Bergin   | bergin.sean@epa.gov            |
| To: Matthew Clutter | matthew.clutter@stericycle.com |

Attachments:

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

11201 Renner Boulevard LENEXA, KS 66219

**Toxics Release Inventory (TRI) Data Quality Questions [(SOLVENT RECOVERY CORP) (TRIFID: 64101SLVNT700MU)] for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 08 10:53:03 EST 2022

Dear Matthew Clutter:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The for NO\_VALUE submitted to EPA from your facility: SOLVENT RECOVERY CORP) - (TRIFID: 64101SLVNT700MU) for reporting year(s) 2020 has been identified for follow-up due to the following:**

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cbi\_pfas\_list\_1\_8\_2021\_final.pdf) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have received approximately 1 hazardous waste shipments (some e-Manifest #: 1) totaling 16,767 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=cd06acc0-c2a3-4400-a37d-9d343c2ce09d&target=d5ad3593-82a8-46c0-acc5-33e95cb34a1e>

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Thank you for your attention to this matter.

Sincerely,

Sean Bergin

**EPA Email – OG-2**

Region 7 Email

04/07/2022 12:27pm

From: Sean Bergin

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(SOLVENT RECOVERY CORP) (TRIFID: 64101SLVNT700MU)] for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To             | E-Mail Address                 |
|---------------------|--------------------------------|
| Self: Sean Bergin   | bergin.sean@epa.gov            |
| To: Matthew Clutter | matthew.clutter@stericycle.com |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

11201 Renner Boulevard LENEXA, KS 66219

**Toxics Release Inventory (TRI) Data Quality Questions [(SOLVENT RECOVERY CORP) (TRIFID: 64101SLVNT700MU)] for Reporting Year(s) 2020 - Due April 29, 2022**

Thu Apr 07 16:27:39 UTC 2022

Dear Matthew Clutter:

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**Email sent on 03/08/2022 10:53am**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

11201 Renner Boulevard LENEXA, KS 66219

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Thank you for your attention to this matter.

Sincerely,

Sean Bergin

**ASH GROVE CEMENT CO (66720SHGRVNORTH)  
1801 N SANTA FE, CHANUTE, KS 66720 (Region 7)**

**EPA Email – OG-1**

Region 7 Email

07/27/2021 06:57am

From: *Sean Bergin*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(ASH GROVE CEMENT CO) (TRIFID: 66720SHGRVNORTH)] for RY 2020 - Due September 10, 2021

| Sent To                 | E-Mail Address               |
|-------------------------|------------------------------|
| Self: Sean Bergin       | bergin.sean@epa.gov          |
| To: GERALD RUST         | JERRY.RUST@ASHGROVE.COM      |
| To: JAMES A. HOISINGTON | DREW.HOISINGTON@ASHGROVE.COM |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

11201 Renner Boulevard LENEXA, KS 66219

**Toxics Release Inventory (TRI) Data Quality Questions [(ASH GROVE CEMENT CO) (TRIFID: 66720SHGRVNORTH)]  
Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Tue Jul 27 10:56:57 EDT 2021

Dear GERALD RUST and JAMES A. HOISINGTON:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for 2-Propenoic acid, butyl ester, telomer with 2-  
[[[heptadecafluorooctyl)sulfonyl]methylamino]ethyl 2-propenoate, 2-  
[methyl[(nonafluorobutyl)sulfonyl]amino]ethyl 2-propenoate, α-(2-methyl-1-oxo-2-propenyl)-ω-  
hydroxypoly(oxy-1,4-butanediyl), α-(2-methyl-1-oxo-2-propenyl)-ω-[(2-methyl-1-oxo-2-propenyl)oxy]poly(oxy-  
1,4-butanediyl), 2-[methyl[(pentadecafluoroheptyl)sulfonyl]amino]ethyl 2-propenoate, 2-  
[methyl[(tridecafluorohexyl)sulfonyl]amino]ethyl 2-propenoate, 2-  
[methyl[(undecafluoropentyl)sulfonyl]amino]ethyl 2-propenoate and 1-octanethiol and Xylene (mixed isomers)**

submitted to EPA from your facility [(Name: ASH GROVE CEMENT CO) - (TRIFID: 66720SHGRVNORTH)] for reporting year(s) 2020 has been identified for follow-up due to the following:

Reporting Year 2020

- Your facility reported 2,800,000 pounds of total energy recovery for Xylene (mixed isomers) in the current year 2020. This was an a decrease of 1,400,000 pounds from the previous year amount of 4,200,000 pounds. Check the on- and off-site quantities used for Energy Recovery in Sections 8.2 and 8.3 of the Form R.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for 2-Propenoic acid, butyl ester, telomer with 2-[[[(heptadecafluorooctyl)sulfonyl]methylamino]ethyl 2-propenoate, 2-[methyl[(nonafluorobutyl)sulfonyl]amino]ethyl 2-propenoate, α-(2-methyl-1-oxo-2-propenyl)-ω-hydroxypoly(oxy-1,4-butanediyl), α-(2-methyl-1-oxo-2-propenyl)-ω-[(2-methyl-1-oxo-2-propenyl)oxy]poly(oxy-1,4-butanediyl), 2-[methyl[(pentadecafluoroheptyl)sulfonyl]amino]ethyl 2-propenoate, 2-[methyl[(tridecafluorohexyl)sulfonyl]amino]ethyl 2-propenoate, 2-[methyl[(undecafluoropentyl)sulfonyl]amino]ethyl 2-propenoate and 1-octanethiol to TRI for reporting year 2020, but might have received 2-Propenoic acid, butyl ester, telomer with 2-[[[(heptadecafluorooctyl)sulfonyl]methylamino]ethyl 2-propenoate, 2-[methyl[(nonafluorobutyl)sulfonyl]amino]ethyl 2-propenoate, α-(2-methyl-1-oxo-2-propenyl)-ω-hydroxypoly(oxy-1,4-butanediyl), α-(2-methyl-1-oxo-2-propenyl)-ω-[(2-methyl-1-oxo-2-propenyl)oxy]poly(oxy-1,4-butanediyl), 2-[methyl[(pentadecafluoroheptyl)sulfonyl]amino]ethyl 2-propenoate, 2-[methyl[(tridecafluorohexyl)sulfonyl]amino]ethyl 2-propenoate, 2-[methyl[(undecafluoropentyl)sulfonyl]amino]ethyl 2-propenoate and 1-octanethiol in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment, and also might have reported this chemical, 2-Propenoic acid, butyl ester, telomer with 2-[[[(heptadecafluorooctyl)sulfonyl]methylamino]ethyl 2-propenoate, 2-[methyl[(nonafluorobutyl)sulfonyl]amino]ethyl 2-propenoate, α-(2-methyl-1-oxo-2-propenyl)-ω-hydroxypoly(oxy-1,4-butanediyl), α-(2-methyl-1-oxo-2-propenyl)-ω-[(2-methyl-1-oxo-2-propenyl)oxy]poly(oxy-1,4-butanediyl), 2-[methyl[(pentadecafluoroheptyl)sulfonyl]amino]ethyl 2-propenoate, 2-[methyl[(tridecafluorohexyl)sulfonyl]amino]ethyl 2-propenoate, 2-[methyl[(undecafluoropentyl)sulfonyl]amino]ethyl 2-propenoate and 1-octanethiol to 2020 CDR as manufactured / imported. Please review and submit new report for 2-Propenoic acid, butyl ester, telomer with 2-[[[(heptadecafluorooctyl)sulfonyl]methylamino]ethyl 2-propenoate, 2-[methyl[(nonafluorobutyl)sulfonyl]amino]ethyl 2-propenoate, α-(2-methyl-1-oxo-2-propenyl)-ω-hydroxypoly(oxy-1,4-butanediyl), α-(2-methyl-1-oxo-2-propenyl)-ω-[(2-methyl-1-oxo-2-propenyl)oxy]poly(oxy-1,4-butanediyl), 2-[methyl[(pentadecafluoroheptyl)sulfonyl]amino]ethyl 2-propenoate, 2-[methyl[(tridecafluorohexyl)sulfonyl]amino]ethyl 2-propenoate, 2-[methyl[(undecafluoropentyl)sulfonyl]amino]ethyl 2-propenoate and 1-octanethiol for reporting year 2020, if required.

***How do I respond to this inquiry?***

*Step 1:*

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=fb451da7-97ca-4ded-a7a0-9167f0e0ad4d&target=4e62e379-19ed-4aa1-be77-31bc9b313021>

***If you indicate new submission, revision or withdrawal in web response questionnaire, please proceed to step 2.***

*Step 2:*

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you would like to make any revisions, withdrawals or new submissions, **please send them to EPA by September 10, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have any follow up questions, please contact Sean Bergin at [bergin.sean@epa.gov](mailto:bergin.sean@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Sean Bergin

11201 Renner Boulevard LENEXA, KS 66219

**EPA Email – OG-2**

Region 7 Email

08/31/2021 05:52am

From: *Sean Bergin*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(ASH GROVE CEMENT CO) (TRIFID: 66720SHGRVNORTH)] Form R for Reporting Year(s) 2020 - Due September 10, 2021

| Sent To           | E-Mail Address   |
|-------------------|--|
| Self: Sean Bergin | <a href="mailto:bergin.sean@epa.gov">bergin.sean@epa.gov</a>         |
| To: GERALD RUST   | <a href="mailto:JERRY.RUST@ASHGROVE.COM">JERRY.RUST@ASHGROVE.COM</a> |

| Sent To                 | E-Mail Address               |
|-------------------------|------------------------------|
| To: JAMES A. HOISINGTON | DREW.HOISINGTON@ASHGROVE.COM |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

11201 Renner Boulevard LENEXA, KS 66219

**Toxics Release Inventory (TRI) Data Quality Questions [(ASH GROVE CEMENT CO) (TRIFID: 66720SHGRVNORTH)]  
Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Tue Aug 31 09:52:03 EDT 2021

Dear GERALD RUST and JAMES A. HOISINGTON:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for 2-Propenoic acid, butyl ester, telomer with 2-[[[(heptadecafluorooctyl)sulfonyl]methylamino]ethyl 2-propenoate, 2-[methyl[(nonafluorobutyl)sulfonyl]amino]ethyl 2-propenoate,  $\alpha$ -(2-methyl-1-oxo-2-propenyl)- $\omega$ -hydroxypoly(oxy-1,4-butanediyl),  $\alpha$ -(2-methyl-1-oxo-2-propenyl)- $\omega$ -[(2-methyl-1-oxo-2-propenyl)oxy]poly(oxy-1,4-butanediyl), 2-[methyl[(pentadecafluoroheptyl)sulfonyl]amino]ethyl 2-propenoate, 2-[methyl[(tridecafluorohexyl)sulfonyl]amino]ethyl 2-propenoate, 2-[methyl[(undecafluoropentyl)sulfonyl]amino]ethyl 2-propenoate and 1-octanethiol and Xylene (mixed isomers) submitted to EPA from your facility: *ASH GROVE CEMENT CO*) - (TRIFID: 66720SHGRVNORTH) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Your facility reported 2,800,000 pounds of total energy recovery for Xylene (mixed isomers) in the current year 2020. This was an a decrease of 1,400,000 pounds from the previous year amount of 4,200,000 pounds. Check the on- and off-site quantities used for Energy Recovery in Sections 8.2 and 8.3 of the Form R.
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***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

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If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by September 10, 2021.**

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Thank you for your attention to this matter.

Sincerely,

Sean Bergin

**Email sent on 07/27/2021 10:57am**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

11201 Renner Boulevard LENEXA, KS 66219

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Form R for Reporting Year(s) 2020 - Due September 10, 2021**

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submitted to EPA from your facility [(Name: ASH GROVE CEMENT CO) - (TRIFID: 66720SHGRVNORTH)] for  
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***How do I respond to this inquiry?***

***Step 1:***

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=fb451da7-97ca-4ded-a7a0-9167f0e0ad4d&target=4e62e379-19ed-4aa1-be77-31bc9b313021>

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Thank you for your attention to this matter.

Sincerely,

Sean Bergin

11201 Renner Boulevard LENEXA, KS 66219

### EPA Email – OG-3

Headquarters Email

09/22/2021 02:12pm

From: *Velu Senthil*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To                 | E-Mail Address               |
|-------------------------|------------------------------|
| Cc: Bergin.Sean@epa.gov | Bergin.Sean@epa.gov          |
| To: GERALD RUST         | JERRY.RUST@ASHGROVE.COM      |
| To: JAMES A. HOISINGTON | DREW.HOISINGTON@ASHGROVE.COM |

Attachments:

#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

Wed Sep 22 18:12:42 EDT 2021

Dear GERALD RUST and JAMES A. HOISINGTON:

EPA would like to inform you that data quality issues raised for your facility [ASH GROVE CEMENT CO (TRIFID: 66720SHGRVNORTH)] during reporting year 2020 National Analysis Data Quality Checks cycle are resolved for the following:

## Reporting Year(s) Chemicals

2020 2-Propenoic acid, butyl ester, telomer with 2-[[[(heptadecafluorooctyl)sulfonyl]methylamino]ethyl 2-propenoate, 2-[methyl[(nonafluorobutyl)sulfonyl]amino]ethyl 2-propenoate,  $\alpha$ -(2-methyl-1-oxo-2-propenyl)- $\omega$ -hydroxypoly(oxy-1,4-butanediyl),  $\alpha$ -(2-methyl-1-oxo-2-propenyl)- $\omega$ -[(2-methyl-1-oxo-2-propenyl)oxy]poly(oxy-1,4-butanediyl), 2-[methyl[(pentadecafluoroheptyl)sulfonyl]amino]ethyl 2-propenoate, 2-[methyl[(tridecafluorohexyl)sulfonyl]amino]ethyl 2-propenoate, 2-[methyl[(undecafluoropentyl)sulfonyl]amino]ethyl 2-propenoate and 1-octanethiol and Xylene (mixed isomers)

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Velu Senthil

TRI Data Quality Program

US EPA

**Email sent on 09/22/2021 03:42pm**

ASH GROVE CEMENT CO - 66720SHGRVNORTH submitted a web response on Sep 22, 2021 3:42:16 PM. A PDF copy of the web response is attached.

## **Facility Response – IC-1**

Subject: Facility Response Form

Sep 22, 2021 3:42:16 PM

From: James Hoisington

(620) 433-3570 drew.hoisington@ashgrove.com

Contractor Company Name: Ash Grove Cement

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

PFAS-NOT RY 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for 2-Propenoic acid, butyl ester, telomer with 2-[[[(heptadecafluorooctyl)sulfonyl]methylamino]ethyl 2-propenoate, 2-[methyl[(nonafluorobutyl)sulfonyl]amino]ethyl 2-propenoate,  $\alpha$ -(2-methyl-1-oxo-2-propenyl)- $\omega$ -hydroxypoly(oxy-1,4-butanediyl),  $\alpha$ -(2-methyl-1-oxo-2-propenyl)- $\omega$ -[(2-methyl-1-oxo-2-propenyl)oxy]poly(oxy-1,4-butanediyl), 2-[methyl[(pentadecafluoroheptyl)sulfonyl]amino]ethyl 2-propenoate, 2-[methyl[(tridecafluorohexyl)sulfonyl]amino]ethyl 2-propenoate, 2-[methyl[(undecafluoropentyl)sulfonyl]amino]ethyl 2-propenoate and 1-octanethiol to TRI for reporting year 2020, but might have received 2-Propenoic acid, butyl ester, telomer with 2-[[[(heptadecafluorooctyl)sulfonyl]methylamino]ethyl 2-propenoate, 2-

[methyl[(nonafluorobutyl)sulfonyl]amino]ethyl 2-propenoate,  $\alpha$ -(2-methyl-1-oxo-2-propenyl)- $\omega$ -hydroxypoly(oxy-1,4-butanediyl),  $\alpha$ -(2-methyl-1-oxo-2-propenyl)- $\omega$ -[(2-methyl-1-oxo-2-propenyl)oxy]poly(oxy-1,4-butanediyl), 2-[methyl[(pentadecafluoroheptyl)sulfonyl]amino]ethyl 2-propenoate, 2-[methyl[(tridecafluorohexyl)sulfonyl]amino]ethyl 2-propenoate, 2-[methyl[(undecafluoropentyl)sulfonyl]amino]ethyl 2-propenoate and 1-octanethiol in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment, and also might have reported this chemical, 2-Propenoic acid, butyl ester, telomer with 2-[[[(heptadecafluorooctyl)sulfonyl]methylamino]ethyl 2-propenoate, 2-[methyl[(nonafluorobutyl)sulfonyl]amino]ethyl 2-propenoate,  $\alpha$ -(2-methyl-1-oxo-2-propenyl)- $\omega$ -hydroxypoly(oxy-1,4-butanediyl),  $\alpha$ -(2-methyl-1-oxo-2-propenyl)- $\omega$ -[(2-methyl-1-oxo-2-propenyl)oxy]poly(oxy-1,4-butanediyl), 2-[methyl[(pentadecafluoroheptyl)sulfonyl]amino]ethyl 2-propenoate, 2-[methyl[(tridecafluorohexyl)sulfonyl]amino]ethyl 2-propenoate, 2-[methyl[(undecafluoropentyl)sulfonyl]amino]ethyl 2-propenoate and 1-octanethiol to 2020 CDR as manufactured / imported. Please review and submit new report for 2-Propenoic acid, butyl ester, telomer with 2-[[[(heptadecafluorooctyl)sulfonyl]methylamino]ethyl 2-propenoate, 2-[methyl[(nonafluorobutyl)sulfonyl]amino]ethyl 2-propenoate,  $\alpha$ -(2-methyl-1-oxo-2-propenyl)- $\omega$ -hydroxypoly(oxy-1,4-butanediyl),  $\alpha$ -(2-methyl-1-oxo-2-propenyl)- $\omega$ -[(2-methyl-1-oxo-2-propenyl)oxy]poly(oxy-1,4-butanediyl), 2-[methyl[(pentadecafluoroheptyl)sulfonyl]amino]ethyl 2-propenoate, 2-[methyl[(tridecafluorohexyl)sulfonyl]amino]ethyl 2-propenoate, 2-[methyl[(undecafluoropentyl)sulfonyl]amino]ethyl 2-propenoate and 1-octanethiol for reporting year 2020, if required.

The source of these releases and quantities are listed below:

| Reported Chemical   | Reporting Year (if Response applicable)  |
|---|--|
| 2-Propenoic acid, butyl ester, telomer with 2-[[[(heptadecafluorooctyl)sulfonyl]methylamino]ethyl 2-propenoate, 2-[methyl[(nonafluorobutyl)sulfonyl]amino]ethyl 2-propenoate, $\alpha$ -(2-methyl-1-oxo-2-propenyl)- $\omega$ -hydroxypoly(oxy-1,4-butanediyl), $\alpha$ -(2-methyl-1-oxo-2-propenyl)- $\omega$ -[(2-methyl-1-oxo-2-propenyl)oxy]poly(oxy-1,4-butanediyl), 2-[methyl[(pentadecafluoroheptyl)sulfonyl]amino]ethyl 2-propenoate, 2-[methyl[(tridecafluorohexyl)sulfonyl]amino]ethyl 2-propenoate, 2-[methyl[(undecafluoropentyl)sulfonyl]amino]ethyl 2-propenoate and 1-octanethiol | No Change  |
| Reason for Response   | Based on testing and information provided to Ash Grove by hazardous waste generators (i.e., Best Available Information) of waste derived fuel that Ash Grove utilizes for energy recovery, there is no information to support reporting these chemicals. |

- Your facility reported 2,800,000 pounds of total energy recovery for Xylene (mixed isomers) in the current year 2020. This was an a decrease of 1,400,000 pounds from the previous year amount of 4,200,000 pounds. Check the on- and off-site quantities used for Energy Recovery in Sections 8.2 and 8.3 of the Form R.

The source of these releases and quantities are listed below:

| Reported Chemical      | Response   | Reporting Year<br>(if applicable) |
|------------------------|--|-----------------------------------|
| Xylene (mixed isomers) | No Change  |                                   |
| Reason for Response    | Ash Grove tests our waste derived fuels received from off-site on a quarterly basis. Based on this testing, concentrations of chemicals, including xylene, vary from year to year. Since Ash Grove utilizes millions of pounds of waste derived fuel per year, small concentration variations in individual chemicals, including xylene, add up to substantive changes in the pound quantities of materials being reported. This is normal and Ash Grove does not require a change to the 2020 reported chemical (xylene). |                                   |

.....

**LEARJET INC (67209LRJTC8220W)**  
**1 LEARJET WAY, WICHITA, KS 67209 (Region 7)**

**EPA Email – OG-1**

Region 7 Email

03/08/2022 05:49am

From: *Sean Bergin*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(LEARJET INC) (TRIFID: 67209LRJTC8220W)] for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To             | E-Mail Address                      |
|---------------------|-------------------------------------|
| Self: Sean Bergin   | bergin.sean@epa.gov                 |
| To: RANDY ZIMMERMAN | RANDY.ZIMMERMAN@AERO.BOMBARDIER.COM |
| To: ERIN BRADY      | ERIN.BRADY@AERO.BOMBARDIER.COM      |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

11201 Renner Boulevard LENEXA, KS 66219

**Toxics Release Inventory (TRI) Data Quality Questions [(LEARJET INC) (TRIFID: 67209LRJTC8220W)] for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 08 10:49:48 EST 2022

Dear ERIN BRADY and RANDY ZIMMERMAN:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The for NO\_VALUE submitted to EPA from your facility: LEARJET INC) - (TRIFID: 67209LRJTC8220W) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS)

([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 1 hazardous waste shipments (some e-Manifest #: 1) totaling 16,767 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=2da7a388-eea2-4b1c-ae36-83e822516058&target=ec3a7ba2-2954-4cef-9855-6a30114933ba>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Sean Bergin at [bergin.sean@epa.gov](mailto:bergin.sean@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Sean Bergin

**EPA Email – OG-2**

Region 7 Email

04/07/2022 12:18pm

From: Sean Bergin

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(LEARJET INC) (TRIFID: 67209LRJTC8220W)] for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To             | E-Mail Address                      |
|---------------------|-------------------------------------|
| Self: Sean Bergin   | bergin.sean@epa.gov                 |
| To: RANDY ZIMMERMAN | RANDY.ZIMMERMAN@AERO.BOMBARDIER.COM |
| To: ERIN BRADY      | ERIN.BRADY@AERO.BOMBARDIER.COM      |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

11201 Renner Boulevard LENEXA, KS 66219

**Toxics Release Inventory (TRI) Data Quality Questions [(LEARJET INC) (TRIFID: 67209LRJTC8220W)] for Reporting Year(s) 2020 - Due April 29, 2022**

Thu Apr 07 16:18:07 UTC 2022

Dear ERIN BRADY and RANDY ZIMMERMAN:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The for NO\_VALUE submitted to EPA from your facility: LEARJET INC) - (TRIFID: 67209LRJTC8220W) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 1 hazardous waste shipments (some e-Manifest #s: 1) totaling 16,767 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

Step 1:

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=cf5ef688-35b6-41dc-a204-4d89449b3f7d&target=ec3a7ba2-2954-4cef-9855-6a30114933ba>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

Step 2:

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Sean Bergin at [bergin.sean@epa.gov](mailto:bergin.sean@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Sean Bergin

**Email sent on 03/08/2022 10:49am**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

11201 Renner Boulevard LENEXA, KS 66219

**Toxics Release Inventory (TRI) Data Quality Questions [(LEARJET INC) (TRIFID: 67209LRJTC8220W)] for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 08 10:49:48 EST 2022

Dear ERIN BRADY and RANDY ZIMMERMAN:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The for NO\_VALUE submitted to EPA from your facility: LEARJET INC) - (TRIFID: 67209LRJTC8220W) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 1 hazardous waste shipments (some e-Manifest #s: 1) totaling 16,767 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

*Step 1:*

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=2da7a388-eea2-4b1c-ae36-83e822516058&target=ec3a7ba2-2954-4cef-9855-6a30114933ba>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

*Step 2:*

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Sean Bergin at [bergin.sean@epa.gov](mailto:bergin.sean@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Sean Bergin

---

US DOD USAF BARKSDALE AFB (71110SRFRC2CES3)  
334 DAVIS AVE W SUITE 208, BARKSDALE AFB, LA  
71110 (Region 6)

**EPA Email – OG-1**

Region 6 Email

03/07/2022 05:52am

From: *Morton Wakeland*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF BARKSDALE AFB) (TRIFID: 71110SRFRC2CES3)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To               | E-Mail Address              |
|-----------------------|-----------------------------|
| Self: Morton Wakeland | wakeland.morton@epa.gov     |
| To: BW PUBLIC AFFAIRS | 2BW.PA@US.AF.MIL            |
| To: KATE HASAPES      | STEPHANIE.HASAPES@US.AF.MIL |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1201 Elm Street Suite 500 DALLAS, TX 75270-2102

**Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF BARKSDALE AFB) (TRIFID: 71110SRFRC2CES3)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Mon Mar 07 10:52:02 EST 2022

Dear BW PUBLIC AFFAIRS and KATE HASAPES:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: US DOD USAF BARKSDALE AFB) - (TRIFID: 71110SRFRC2CES3) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 1 hazardous waste shipments (some e-Manifest #: 1) totaling 32,134 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=9c80e4cc-5a20-4fa3-9948-48e7ea4dfd6e&target=b461044d-8634-42d1-a56a-e74829bc7538>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Morton Wakeland at [wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Morton Wakeland

**EPA Email – OG-2**

Headquarters Email

03/09/2022 12:44pm

From: *Velu Senthil*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To                     | E-Mail Address              |
|-----------------------------|-----------------------------|
| Cc: wakeland.morton@epa.gov | wakeland.morton@epa.gov     |
| To: BW PUBLIC AFFAIRS       | 2BW.PA@US.AF.MIL            |
| To: KATE HASAPES            | STEPHANIE.HASAPES@US.AF.MIL |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

Wed Mar 09 17:44:11 EST 2022

Dear BW PUBLIC AFFAIRS and KATE HASAPES:

EPA would like to inform you that data quality issues raised for your facility [US DOD USAF BARKSDALE AFB (TRIFID: 71110SRFRC2CES3)] during reporting year 2020 National Analysis Data Quality Checks cycle are resolved for the following:

Reporting Year(s) Chemicals

2020 PFAS chemicals

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Velu Senthil

TRI Data Quality Program

US EPA

**Email sent on 03/09/2022 02:59pm**

US DOD USAF BARKSDALE AFB - 71110SRFRC2CES3 submitted a web response on Mar 9, 2022 7:58:16 PM. A PDF copy of the web response is attached.

**Facility Response – IC-1**

Subject: Facility Response Form

From: Kate Hasapes

(318) 456-2770

Mar 9, 2022 7:58:16 PM

stephanie.hasapes@us.af.mil

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

PFAS-NOT-F RY 2020

The source of these releases and quantities are listed below:

| Response            |  | Reporting Year<br>(if applicable) |
|---------------------|--|-----------------------------------|
| No Change           |  |                                   |
| Reason for Response | TRI-listed PFAS chemical thresholds were not exceeded for CY2020 and no Form R reporting was required. The Safety Data Sheet for the material did not indicate the presence of any TRI-listed PFAS chemical. |                                   |

.....

ELEMENTAL ENVIRONMENTAL SOLUTIONS  
LLC (71923RYNLD500ER)  
500 E REYNOLDS RD, ARKADELPHIA, AR 71923 (Region 6)

**EPA Email – OG-1**

Region 6 Email

03/07/2022 05:28am

From: *Morton Wakeland*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(ELEMENTAL ENVIRONMENTAL SOLUTIONS LLC) (TRIFID: 71923RYNLD500ER)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To               | E-Mail Address          |
|-----------------------|-------------------------|
| Self: Morton Wakeland | wakeland.morton@epa.gov |
| To: BRITT SCHEER      | BRITT.SCHEER@VEOLIA.COM |
| To: COLE CLARK        | COLE.CLARK@VEOLIA.COM   |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1201 Elm Street Suite 500 DALLAS, TX 75270-2102

**Toxics Release Inventory (TRI) Data Quality Questions [(ELEMENTAL ENVIRONMENTAL SOLUTIONS LLC) (TRIFID: 71923RYNLD500ER)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Mon Mar 07 10:28:17 EST 2022

Dear BRITT SCHEER and COLE CLARK:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for 1,1,1-Trichloroethane, 1-Bromopropane, 2-Mercaptobenzothiazole, 4,4'-Methylenedianiline, Acetonitrile, Barium compounds (except for barium sulfate (CAS No. 7727-43-7)), Benzo[g,h,i]perylene, Carbon tetrachloride, Certain glycol ethers, Chromium compounds (except for chromite ore mined in the Transvaal Region), Copper compounds, Cyanide compounds, Dibutyl phthalate, Diethanolamine, Dimethyl phthalate, Ethylene glycol, Formaldehyde, Lithium carbonate, Manganese compounds, Mercury compounds, N-Methyl-2-pyrrolidone, Nickel compounds, Nitric acid, Selenium compounds, Silver compounds, Styrene,**

**Tetrafluoroethylene, Xylene (mixed isomers), Zinc compounds and n-Butyl alcohol submitted to EPA from your facility: *ELEMENTAL ENVIRONMENTAL SOLUTIONS LLC* - (TRIFID: 71923RYNLD500ER) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Your facility appeared to have received approximately 380,700 POUNDS of Ethylene glycol for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Ethylene glycol for reporting year 2020. Please review your calculations and submit new report for Ethylene glycol for reporting year 2020, if needed.
- Your facility appeared to have received approximately 433,270 POUNDS of N-Methyl-2-pyrrolidone for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for N-Methyl-2-pyrrolidone for reporting year 2020. Please review your calculations and submit new report for N-Methyl-2-pyrrolidone for reporting year 2020, if needed.
- Your facility appeared to have received approximately 40,171 POUNDS of 1-Bromopropane for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for 1-Bromopropane for reporting year 2020. Please review your calculations and submit new report for 1-Bromopropane for reporting year 2020, if needed.
- Your facility appeared to have received approximately 70,843 POUNDS of Acetonitrile for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Acetonitrile for reporting year 2020. Please review your calculations and submit new report for Acetonitrile for reporting year 2020, if needed.
- Your facility appeared to have received approximately 22,351 POUNDS of 4,4'-Methylenedianiline for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for 4,4'-Methylenedianiline for reporting year 2020. Please review your calculations and submit new report for 4,4'-Methylenedianiline for reporting year 2020, if needed.
- It appears your facility has received approximately 210 shipments (sub eManifest IDs) totaling 7,526,964 pounds of hazardous waste listed containing Chromium / Chromium compounds from several TRI facilities for reporting year 2020, but your facility does not appear to have reported for Chromium / Chromium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Chromium / Chromium compounds for reporting year 2020, if needed.
- Your facility appeared to have received approximately 150,779 POUNDS of Xylene (mixed isomers) for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Xylene (mixed isomers) for reporting year 2020. Please review your calculations and submit new report for Xylene (mixed isomers) for reporting year 2020, if needed.
- Your facility appeared to have received approximately 24,911 POUNDS of Tetrafluoroethylene for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Tetrafluoroethylene for reporting year 2020. Please review your calculations and submit new report for Tetrafluoroethylene for reporting year 2020, if needed.
- It appears your facility has sent approximately 1 shipment (sub eManifest IDs) totaling 185,125 pounds of hazardous waste listed containing Acetonitrile to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Acetonitrile for reporting year 2020. Could you please review your calculations and submit a new report for Acetonitrile for reporting year 2020, if needed.
- Your facility appeared to have received approximately 32,279 POUNDS of Lithium carbonate for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Lithium carbonate for reporting year

2020. Please review your calculations and submit new report for Lithium carbonate for reporting year 2020, if needed.

- Your facility appeared to have received approximately 334,815 POUNDS of CHROMIUM or CHROMIUM COMPOUNDS for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for either CHROMIUM or CHROMIUM COMPOUNDS for reporting year 2020. Please REVIEW your calculations and submit new report for CHROMIUM or CHROMIUM COMPOUNDS for reporting year 2020, if needed.
- Your facility appeared to have received approximately 15,570 POUNDS of MANGANESE or MANGANESE COMPOUNDS for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for either MANGANESE or MANGANESE COMPOUNDS for reporting year 2020. Please REVIEW your calculations and submit new report for MANGANESE or MANGANESE COMPOUNDS for reporting year 2020, if needed.
- Your facility appeared to have received approximately 59,902 POUNDS of Dibutyl phthalate for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Dibutyl phthalate for reporting year 2020. Please review your calculations and submit new report for Dibutyl phthalate for reporting year 2020, if needed.
- It appears your facility has received approximately 1) shipments (sub eManifest IDs) totaling 173,436 pounds of hazardous waste listed containing Carbon tetrachloride from several TRI facilities for reporting year 2020, but your facility does not appear to have reported for Carbon tetrachloride for reporting year 2020. Could you please review your calculations and submit a new report for Carbon tetrachloride for reporting year 2020, if needed.
- Your facility appeared to have received approximately 419 POUNDS of Benzo[g,h,i]perylene for disposal / treatment, which is over otherwise use threshold amount of 10 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Benzo[g,h,i]perylene for reporting year 2020. Please review your calculations and submit new report for Benzo[g,h,i]perylene for reporting year 2020, if needed.
- Your facility appeared to have received approximately 37,377 POUNDS of Styrene for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Styrene for reporting year 2020. Please review your calculations and submit new report for Styrene for reporting year 2020, if needed.
- Your facility appeared to have received approximately 158,287 POUNDS of COPPER or COPPER COMPOUNDS for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for either COPPER or COPPER COMPOUNDS for reporting year 2020. Please REVIEW your calculations and submit new report for COPPER or COPPER COMPOUNDS for reporting year 2020, if needed.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have received approximately 4 hazardous waste shipments (some e-Manifest #: 4) totaling 123,620 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.
- Your facility appeared to have received approximately 21,303 POUNDS of 2-Mercaptobenzothiazole for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for 2-Mercaptobenzothiazole for reporting year 2020. Please review your calculations and submit new report for 2-Mercaptobenzothiazole for reporting year 2020, if needed.
- It appears your facility has received approximately 15) shipments (sub eManifest IDs) totaling 181,240 pounds of hazardous waste listed containing Selenium / Selenium compounds from several TRI facilities

for reporting year 2020, but your facility does not appear to have reported for Selenium / Selenium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Selenium / Selenium compounds for reporting year 2020, if needed.

- Your facility appeared to have received approximately 873,912 POUNDS of Certain glycol ethers for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Certain glycol ethers for reporting year 2020. Please review your calculations and submit new report for Certain glycol ethers for reporting year 2020, if needed.
- Your facility appeared to have received approximately 646 POUNDS of MERCURY or MERCURY COMPOUNDS for disposal / treatment, which is over otherwise use threshold amount of 10 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for either MERCURY or MERCURY COMPOUNDS for reporting year 2020. Please REVIEW your calculations and submit new report for MERCURY or MERCURY COMPOUNDS for reporting year 2020, if needed.
- Your facility appeared to have received approximately 28,312 POUNDS of Cyanide compounds for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Cyanide compounds for reporting year 2020. Please review your calculations and submit new report for Cyanide compounds for reporting year 2020, if needed.
- Your facility appeared to have received approximately 16,951 POUNDS of SILVER or SILVER COMPOUNDS for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for either SILVER or SILVER COMPOUNDS for reporting year 2020. Please REVIEW your calculations and submit new report for SILVER or SILVER COMPOUNDS for reporting year 2020, if needed.
- Your facility appeared to have received approximately 20,861 POUNDS of n-Butyl alcohol for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for n-Butyl alcohol for reporting year 2020. Please review your calculations and submit new report for n-Butyl alcohol for reporting year 2020, if needed.
- Your facility appeared to have received approximately 42,992 POUNDS of BARIUM or BARIUM COMPOUNDS for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for either BARIUM or BARIUM COMPOUNDS for reporting year 2020. Please REVIEW your calculations and submit new report for BARIUM or BARIUM COMPOUNDS for reporting year 2020, if needed.
- Your facility appeared to have received approximately 69,142 POUNDS of NICKEL or NICKEL COMPOUNDS for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for either NICKEL or NICKEL COMPOUNDS for reporting year 2020. Please REVIEW your calculations and submit new report for NICKEL or NICKEL COMPOUNDS for reporting year 2020, if needed.
- It appears your facility has received approximately 4) shipments (sub eManifest IDs) totaling 117,096 pounds of hazardous waste listed containing Barium / Barium compounds from several TRI facilities for reporting year 2020, but your facility does not appear to have reported for Barium / Barium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Barium / Barium compounds for reporting year 2020, if needed.
- Your facility appeared to have received approximately 32,865 POUNDS of Dimethyl phthalate for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Dimethyl phthalate for reporting year 2020. Please review your calculations and submit new report for Dimethyl phthalate for reporting year 2020, if needed.
- It appears your facility has received approximately 29) shipments (sub eManifest IDs) totaling 1,588,544 pounds of hazardous waste listed containing Acetonitrile from several TRI facilities for reporting year 2020, but your facility does not appear to have reported for Acetonitrile for reporting year 2020. Could

you please review your calculations and submit a new report for Acetonitrile for reporting year 2020, if needed.

- Your facility appeared to have received approximately 206,549 POUNDS of ZINC or ZINC COMPOUNDS for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for either ZINC or ZINC COMPOUNDS for reporting year 2020. Please REVIEW your calculations and submit new report for ZINC or ZINC COMPOUNDS for reporting year 2020, if needed.
- Your facility appeared to have received approximately 58,102 POUNDS of 1,1,1-Trichloroethane for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for 1,1,1-Trichloroethane for reporting year 2020. Please review your calculations and submit new report for 1,1,1-Trichloroethane for reporting year 2020, if needed.
- Your facility appeared to have received approximately 19,143 POUNDS of Diethanolamine for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Diethanolamine for reporting year 2020. Please review your calculations and submit new report for Diethanolamine for reporting year 2020, if needed.
- Your facility appeared to have received approximately 68,208 POUNDS of Formaldehyde for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Formaldehyde for reporting year 2020. Please review your calculations and submit new report for Formaldehyde for reporting year 2020, if needed.
- Your facility appeared to have received approximately 188,878 POUNDS of Nitric acid for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Nitric acid for reporting year 2020. Please review your calculations and submit new report for Nitric acid for reporting year 2020, if needed.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=5dd1432b-c2dd-4348-871b-a981d2ec53bc&target=e0e2be5d-305e-4220-89a6-297fd128190e>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Morton Wakeland at wakeland.morton@epa.gov.

Thank you for your attention to this matter.

Sincerely,

Morton Wakeland

## **EPA Email – OG-2**

**From:** Wakeland, Morton <wakeland.morton@epa.gov>

**Sent:** Friday, April 8, 2022 6:28 PM

**To:** Clark, Cole <cole.clark@veolia.com>

**Subject:** RE: Toxics Release Inventory (TRI) Data Quality Questions [(ELEMENTAL ENVIRONMENTAL SOLUTIONS LLC) (TRIFID: 71923RYNLD500ER)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

**Importance:** High

Found some old communications regarding EES –

The purchase date I have is Feb 1, 2020.

Is this still a correct date?

Presuming so, then EES would be the owner/operator on July 1, 2020, the date the 2019 TRI Reporting forms were due.

While we agree on the likelihood of no PFAS chemicals coming into EES in 2020 there are other inconsistencies in what the Envirofacts database has, and what you have reported thus far.

For example:

You sent the following usages:

Certain Glycol Ethers - 769,421.16 lbs

N-Methyl-2-Pyrrolidone - 18,664 lbs

Cyanide Compounds - 263,127.07 lbs

The report I ran in Envirofacts shows (the number on the far left is the Region of the sender for the chemical).

<https://enviro.epa.gov/>

|               |      |                       |   |             |
|---------------|------|-----------------------|---|-------------|
| 9             | 2020 | Certain glycol ethers | 0 | 210,000.0   |
| 10            | 2020 | Certain glycol ethers | 0 | 490,000.0   |
| 9             | 2020 | Certain glycol ethers | 0 | 57,000.0    |
| 9             | 2020 | Certain glycol ethers | 0 | 4,800.0     |
| 8             | 2020 | Certain glycol ethers | 0 | 103,360.9   |
| 7             | 2020 | Certain glycol ethers | 0 | 138.0       |
| 10            | 2020 | Certain glycol ethers | 0 | 260,000.0   |
| TOTAL POUNDS: |      |                       |   | 1,125,298.9 |

|               |      |                        |   |           |
|---------------|------|------------------------|---|-----------|
| TOTAL POUNDS: |      |                        |   | 6,400.0   |
| 9             | 2020 | N-Methyl-2-pyrrolidone | 0 | 6,400.0   |
| 4             | 2020 | N-Methyl-2-pyrrolidone | 0 | 12,000.0  |
| 10            | 2020 | N-Methyl-2-pyrrolidone | 0 | 130,000.0 |
| 9             | 2020 | N-Methyl-2-pyrrolidone | 0 | 23,000.0  |
| 9             | 2020 | N-Methyl-2-pyrrolidone | 0 | 530.0     |
| 7             | 2020 | N-Methyl-2-pyrrolidone | 0 | 90.0      |
| 10            | 2020 | N-Methyl-2-pyrrolidone | 0 | 220,000.0 |
| TOTAL POUNDS: |      |                        |   | 392,020.0 |

|   |      |                   |   |          |
|---|------|-------------------|---|----------|
| 5 | 2020 | Cyanide compounds | 0 | 28,312.0 |
|---|------|-------------------|---|----------|

EES has not reported for the *otherwise use of*

Certain Glycol Ethers for 2020

Cyanide Compounds for 2020

or

N-Methyl-2-Pyrrolidone

All of which exceeded the 10,000 lbs/yr *otherwise use threshold*

|    | A  | B    | C    | D | E                                    |
|----|--|------|------|---|--------------------------------------|
| 1  | TRI_CHEMICAL   | 2019 | 2020 |   | TRI Chemical Was Reported on Time    |
| 2  | Ammonia  |      |      |   |                                      |
| 3  | Barium compounds (except for barium sulfate (CAS No. 7727-43-7)) |      |      |   | TRI Chemical Was Reported, But Late  |
| 4  | Certain glycol ethers  |      |      |   |                                      |
| 5  | Cyanide compounds  |      |      |   | TRI Chemical Was Not Reported At All |
| 6  | Cyclohexane  |      |      |   |                                      |
| 7  | Dichloromethane  |      |      |   |                                      |
| 8  | Dioxin and dioxin-like compounds                                 |      |      |   |                                      |
| 9  | Ethylbenzene   |      |      |   |                                      |
| 10 | Ethylene glycol  |      |      |   |                                      |
| 11 | Heptachlor   |      |      |   |                                      |
| 12 | Hexachlorobenzene  |      |      |   |                                      |
| 13 | Lead compounds   |      |      |   |                                      |
| 14 | Methanol   |      |      |   |                                      |
| 15 | Methoxychlor   |      |      |   |                                      |
| 16 | Methyl isobutyl ketone   |      |      |   |                                      |
| 17 | Polycyclic aromatic compounds                                    |      |      |   |                                      |
| 18 | Toluene  |      |      |   |                                      |
| 19 | Toxaphene  |      |      |   |                                      |
| 20 | Triethylamine  |      |      |   |                                      |
| 21 | Vinylidene chloride  |      |      |   |                                      |
| 22 |  |      |      |   |                                      |

Furthermore, Acetonitrile exceeded the 10,000 lbs/yr *otherwise use threshold* for 2020 and not reported.

|               |      |              |   |          |
|---------------|------|--------------|---|----------|
| 2             | 2020 | Acetonitrile | 0 | 23,206.3 |
| 6             | 2020 | Acetonitrile | 0 | 64,474.0 |
| 7             | 2020 | Acetonitrile | 0 | 3,601.0  |
| 5             | 2020 | Acetonitrile | 0 | 7,780.5  |
| TOTAL POUNDS: |      |              |   | 99,061.8 |

Ethylene Glycol exceeded the 10,000 lbs/yr *otherwise use threshold* for 2020 and not reported.

|               |      |                 |   |           |
|---------------|------|-----------------|---|-----------|
| 9             | 2020 | Ethylene glycol | 0 | 210.0     |
| 7             | 2020 | Ethylene glycol | 0 | 122.0     |
| 10            | 2020 | Ethylene glycol | 0 | 1,027.0   |
| 10            | 2020 | Ethylene glycol | 0 | 65,000.0  |
| 9             | 2020 | Ethylene glycol | 0 | 8,900.0   |
| 10            | 2020 | Ethylene glycol | 0 | 27,000.0  |
| 9             | 2020 | Ethylene glycol | 0 | 2,500.0   |
| TOTAL POUNDS: |      |                 |   | 104,759.0 |

Lead and lead compounds (different than lead compounds) exceeded the 100 lbs/yr *otherwise use threshold* for 2020 and not reported.

|               |      |                         |   |         |
|---------------|------|-------------------------|---|---------|
| 2             | 2020 | Lead And Lead Compounds | 0 | 20.5    |
| 7             | 2020 | Lead And Lead Compounds | 0 | 9.5     |
| 5             | 2020 | Lead And Lead Compounds | 0 | 7,124.0 |
| 5             | 2020 | Lead And Lead Compounds | 0 | 730.0   |
| 5             | 2020 | Lead And Lead Compounds | 0 | 50.0    |
| TOTAL POUNDS: |      |                         |   | 7,934.0 |

Nitric Acid exceeded the 10,000 lbs/yr *otherwise use threshold* for 2020 and not reported.

|               |      |             |   |          |
|---------------|------|-------------|---|----------|
| 10            | 2020 | Nitric acid | 0 | 209.0    |
| 4             | 2020 | Nitric acid | 0 | 70,314.0 |
| TOTAL POUNDS: |      |             |   | 70,523.0 |

Benzo[g,h,i]perylene exceeded the 10 lbs/yr *otherwise use threshold* for 2020 and not reported.

|               |      |                      |   |      |
|---------------|------|----------------------|---|------|
| 6             | 2020 | Benzo[g h i]perylene | 0 | 0.2  |
| 2             | 2020 | Benzo[g h i]perylene | 0 | 0.2  |
| 4             | 2020 | Benzo[g h i]perylene | 0 | 28.0 |
| 5             | 2020 | Benzo[g h i]perylene | 0 | 0.1  |
| TOTAL POUNDS: |      |                      |   | 28.5 |

n-Butyl alcohol exceeded the 10,000 lbs/yr *otherwise use threshold* for 2020 and not reported.

|   |      |                 |   |          |
|---|------|-----------------|---|----------|
| 7 | 2020 | n-Butyl alcohol | 0 | 12,822.0 |
|---|------|-----------------|---|----------|

On top of the non-reporting violations for 2020, a number of TRI chemicals were not reported for 2019.

Please provide the usage (lbs) and activity (most likely *otherwise used*) of the following TRI chemicals whose cell is highlighted red for 2019.

| 24 | TRI_CHEMICAL                     | 2019 | 2020 |
|----|----------------------------------|------|------|
| 25 | Dichloromethane                  |      |      |
| 26 | Dioxin and dioxin-like compounds |      |      |
| 27 | Ethylbenzene                     |      |      |
| 28 | Ethylene glycol                  |      |      |
| 29 | Heptachlor                       |      |      |
| 30 | Hexachlorobenzene                |      |      |
| 31 | Methanol                         |      |      |
| 32 | Methoxychlor                     |      |      |
| 33 | Methyl isobutyl ketone           |      |      |
| 34 | Polycyclic aromatic compounds    |      |      |
| 35 | Toluene                          |      |      |
| 36 | Toxaphene                        |      |      |
| 37 | Triethylamine                    |      |      |
| 38 | Vinylidene chloride              |      |      |

I realize this is a lot Cole, but please realize I'm simply doing my homework and some things just do not add up.

If you wish to see the facility who sent a shipment to you in 2020, look at the 3 tab/worksheet on the attached workbook.

I'm including it to help you out a wee bit and to support all the information above.

Thanks again for your cooperation in this matter.

Mort



Morton E. Wakeland, Jr. ("Mort"), Ph.D.

**EPCRA Section 313 Enforcement and TRI**

**Program Coordinator**

**U.S. EPA Region 6**

**Compliance Assurance and Enforcement**

**Division (ECD)**

**Waste Enforcement Branch (ECDS)**

**Toxics Section (ECDST)**

**Dallas, Texas 75270**

**(214) 665-8116**

**EPA Email – OG-3**

Headquarters Email

05/01/2022 12:09pm

From: *Velu Senthil*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To                     | E-Mail Address          |
|-----------------------------|-------------------------|
| Cc: wakeland.morton@epa.gov | wakeland.morton@epa.gov |
| To: COLE CLARK              | COLE.CLARK@VEOLIA.COM   |
| To: COLE CLARK              | COLE.CLARK@VEOLIA.COM   |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

Sun May 01 16:09:23 UTC 2022

Dear COLE CLARK:

EPA would like to inform you that data quality issues raised for your facility [ELEMENTAL ENVIRONMENTAL SOLUTIONS LLC (TRIFID: 71923RYNLD500ER)] during reporting year 2020 Adhoc Data Quality Checks are resolved for the following:

Reporting Year(s) Chemicals

2020 1,1,1-Trichloroethane, 1-Bromopropane, 2-Mercaptobenzothiazole, 4,4'-Methylenedianiline, Acetonitrile, Barium compounds (except for barium sulfate (CAS No. 7727-43-7)), Benzo[g,h,i]perylene, Carbon tetrachloride, Certain glycol ethers, Chromium compounds (except for chromite ore mined in the Transvaal Region), Copper compounds, Cyanide compounds, Dibutyl phthalate, Diethanolamine, Dimethyl phthalate, Ethylene glycol, Formaldehyde, Lithium carbonate, Manganese compounds, Mercury compounds, N-Methyl-2-pyrrolidone, Nickel compounds, Nitric acid, Selenium compounds, Silver compounds, Styrene, Tetrafluoroethylene, Xylene (mixed isomers), Zinc compounds and n-Butyl alcohol

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Velu Senthil

TRI Data Quality Program

US EPA

**Email sent on 04/29/2022 12:38pm**

**ELEMENTAL ENVIRONMENTAL SOLUTIONS LLC - 71923RYNLD500ER submitted a web response on Apr 29, 2022 12:38:29 PM. A PDF copy of the web response is attached.**

**Facility Response – IC-1**

Subject: Facility Response Form  
From: Cole Clark  
Contractor Company Name: ECCI

(870) 245-9119

Apr 29, 2022 12:38:29 PM  
Cole.Clark@veolia.com

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

EMAN-RNO RY 2020

- It appears your facility has sent approximately 1) shipments (sub eManifest IDs) totaling 185,125 pounds of hazardous waste listed containing Acetonitrile to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Acetonitrile for reporting year 2020. Could you please review your calculations and submit a new report for Acetonitrile for reporting year 2020, if needed.

The source of these releases and quantities are listed below:

| Reported Chemical   | Response  | Reporting Year<br>(if applicable) |
|---------------------|---|-----------------------------------|
| Acetonitrile        | New Submission  | 2020                              |
| Reason for Response | After revisiting the compilation of data from profiles of received materials, the facility did receive and amount of this chemical in excess of the relevant threshold. |                                   |

EMAN-TNO RY 2020

- It appears your facility has received approximately 1) shipments (sub eManifest IDs) totaling 173,436 pounds of hazardous waste listed containing Carbon tetrachloride from several TRI facilities for reporting year 2020, but your facility does not appear to have reported for Carbon tetrachloride for reporting year 2020. Could you please review your calculations and submit a new report for Carbon tetrachloride for reporting year 2020, if needed.
- It appears your facility has received approximately 15) shipments (sub eManifest IDs) totaling 181,240 pounds of hazardous waste listed containing Selenium / Selenium compounds from several TRI facilities for reporting year 2020, but your facility does not appear to have reported for Selenium / Selenium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Selenium / Selenium compounds for reporting year 2020, if needed.
- It appears your facility has received approximately 210) shipments (sub eManifest IDs) totaling 7,526,964 pounds of hazardous waste listed containing Chromium / Chromium compounds from several TRI facilities for reporting year 2020, but your facility does not appear to have reported for Chromium / Chromium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Chromium / Chromium compounds for reporting year 2020, if needed.
- It appears your facility has received approximately 29) shipments (sub eManifest IDs) totaling 1,588,544 pounds of hazardous waste listed containing Acetonitrile from several TRI facilities for reporting year 2020, but your facility does not appear to have reported for Acetonitrile for reporting year 2020. Could you please review your calculations and submit a new report for Acetonitrile for reporting year 2020, if needed.
- It appears your facility has received approximately 4) shipments (sub eManifest IDs) totaling 117,096 pounds of hazardous waste listed containing Barium / Barium compounds from several TRI facilities for reporting year 2020, but your facility does not appear to have reported for Barium / Barium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Barium / Barium compounds for reporting year 2020, if needed.

The source of these releases and quantities are listed below:

| Reported Chemical  | Reporting Year (if Response applicable)   |
|--|---|
| Acetonitrile   | New 2020 Submission   |
| Reason for Response  | After revisiting the compilation of data from profiles of received materials, the facility did receive and amount of this chemical in excess of the relevant threshold. |
| Barium compounds (except for barium sulfate (CAS No. 7727-43-7))           | New 2020 Submission   |
| Reason for Response  | After revisiting the compilation of data from profiles of received materials, the facility did receive and amount of this chemical in excess of the relevant threshold. |
| Carbon tetrachloride   | No Change   |
| Reason for Response  | According to information provided upon material receipt, the facility did not receive an amount of this chemical in excess of the relevant threshold.                   |
| Chromium compounds (except for chromite ore mined in the Transvaal Region) | No Change   |
| Reason for Response  | According to information provided upon material receipt, the facility did not receive an amount of this chemical in excess of the relevant threshold.                   |
| Selenium compounds   | No Change   |
| Reason for Response  | According to information provided upon material receipt, the facility did not receive an amount of this chemical in excess of the relevant threshold.                   |

OFF-TSD-MET-NON RY 2020

- Your facility appeared to have received approximately 15,570 POUNDS of MANGANESE or MANGANESE COMPOUNDS for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for either MANGANESE or MANGANESE COMPOUNDS for reporting year 2020. Please REVIEW your calculations and submit new report for MANGANESE or MANGANESE COMPOUNDS for reporting year 2020, if needed.

- Your facility appeared to have received approximately 158,287 POUNDS of COPPER or COPPER COMPOUNDS for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for either COPPER or COPPER COMPOUNDS for reporting year 2020. Please REVIEW your calculations and submit new report for COPPER or COPPER COMPOUNDS for reporting year 2020, if needed.
- Your facility appeared to have received approximately 16,951 POUNDS of SILVER or SILVER COMPOUNDS for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for either SILVER or SILVER COMPOUNDS for reporting year 2020. Please REVIEW your calculations and submit new report for SILVER or SILVER COMPOUNDS for reporting year 2020, if needed.
- Your facility appeared to have received approximately 206,549 POUNDS of ZINC or ZINC COMPOUNDS for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for either ZINC or ZINC COMPOUNDS for reporting year 2020. Please REVIEW your calculations and submit new report for ZINC or ZINC COMPOUNDS for reporting year 2020, if needed.
- Your facility appeared to have received approximately 334,815 POUNDS of CHROMIUM or CHROMIUM COMPOUNDS for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for either CHROMIUM or CHROMIUM COMPOUNDS for reporting year 2020. Please REVIEW your calculations and submit new report for CHROMIUM or CHROMIUM COMPOUNDS for reporting year 2020, if needed.
- Your facility appeared to have received approximately 42,992 POUNDS of BARIUM or BARIUM COMPOUNDS for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for either BARIUM or BARIUM COMPOUNDS for reporting year 2020. Please REVIEW your calculations and submit new report for BARIUM or BARIUM COMPOUNDS for reporting year 2020, if needed
- Your facility appeared to have received approximately 646 POUNDS of MERCURY or MERCURY COMPOUNDS for disposal / treatment, which is over otherwise use threshold amount of 10 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for either MERCURY or MERCURY COMPOUNDS for reporting year 2020. Please REVIEW your calculations and submit new report for MERCURY or MERCURY COMPOUNDS for reporting year 2020, if needed.
- Your facility appeared to have received approximately 69,142 POUNDS of NICKEL or NICKEL COMPOUNDS for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for either NICKEL or NICKEL COMPOUNDS for reporting year 2020. Please REVIEW your calculations and submit new report for NICKEL or NICKEL COMPOUNDS for reporting year 2020, if needed.

The source of these releases and quantities are listed below:

| Reported Chemical  | Reporting Year (if applicable)  |
|--|---|
| Barium compounds (except for barium sulfate (CAS No. 7727-43-7)) | New 2020 Submission   |
| Reason for Response  | After revisiting the compilation of data from profiles of received materials, the facility did receive and amount of this chemical in excess of the relevant threshold. |

| Reported Chemical  | Reporting Year (if applicable)<br>Response   |
|--|--|
| Chromium compounds (except for chromite ore mined in the Transvaal Region) | No Change  |
| Reason for Response  | According to information provided upon material receipt, the facility did not receive an amount of this chemical in excess of the relevant threshold.                  |
| Copper compounds   | No Change  |
| Reason for Response  | According to information provided upon material receipt, the facility did not receive an amount of this chemical in excess of the relevant threshold.                  |
| Manganese compounds  | No Change  |
| Reason for Response  | According to information provided upon material receipt, the facility did not receive an amount of this chemical in excess of the relevant threshold.                  |
| Mercury compounds  | New 2020 Submission  |
| Reason for Response  | After revisiting the compilation of data from profiles of received materials, the facility did receive an amount of this chemical in excess of the relevant threshold. |
| Nickel compounds   | No Change  |
| Reason for Response  | According to information provided upon material receipt, the facility did not receive an amount of this chemical in excess of the relevant threshold.                  |
| Silver compounds   | No Change  |
| Reason for Response  | According to information provided upon material receipt, the facility did not receive an amount of this chemical in excess of the relevant threshold.                  |
| Zinc compounds   | No Change  |

| Reported Chemical  | Reporting Year<br>(if Response applicable)  |
|--|---|
| Reason for Response  | According to information provided upon material receipt, the facility did not receive an amount of this chemical in excess of the relevant threshold. |
| OFF-TSD-NON RY 2020  |   |
| <ul style="list-style-type: none"> <li>• Your facility appeared to have received approximately 150,779 POUNDS of Xylene (mixed isomers) for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Xylene (mixed isomers) for reporting year 2020. Please review your calculations and submit new report for Xylene (mixed isomers) for reporting year 2020, if needed.</li> <li>• Your facility appeared to have received approximately 188,878 POUNDS of Nitric acid for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Nitric acid for reporting year 2020. Please review your calculations and submit new report for Nitric acid for reporting year 2020, if needed.</li> <li>• Your facility appeared to have received approximately 19,143 POUNDS of Diethanolamine for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Diethanolamine for reporting year 2020. Please review your calculations and submit new report for Diethanolamine for reporting year 2020, if needed.</li> <li>• Your facility appeared to have received approximately 20,861 POUNDS of n-Butyl alcohol for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for n-Butyl alcohol for reporting year 2020. Please review your calculations and submit new report for n-Butyl alcohol for reporting year 2020, if needed.</li> <li>• Your facility appeared to have received approximately 21,303 POUNDS of 2-Mercaptobenzothiazole for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for 2-Mercaptobenzothiazole for reporting year 2020. Please review your calculations and submit new report for 2-Mercaptobenzothiazole for reporting year 2020, if needed.</li> <li>• Your facility appeared to have received approximately 22,351 POUNDS of 4,4'-Methylenedianiline for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for 4,4'-Methylenedianiline for reporting year 2020. Please review your calculations and submit new report for 4,4'-Methylenedianiline for reporting year 2020, if needed.</li> <li>• Your facility appeared to have received approximately 24,911 POUNDS of Tetrafluoroethylene for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Tetrafluoroethylene for reporting year 2020. Please review your calculations and submit new report for Tetrafluoroethylene for reporting year 2020, if needed.</li> <li>• Your facility appeared to have received approximately 28,312 POUNDS of Cyanide compounds for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Cyanide compounds for reporting year 2020. Please review your calculations and submit new report for Cyanide compounds for reporting year 2020, if needed.</li> </ul> |   |

- Your facility appeared to have received approximately 32,279 POUNDS of Lithium carbonate for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Lithium carbonate for reporting year 2020. Please review your calculations and submit new report for Lithium carbonate for reporting year 2020, if needed.
- Your facility appeared to have received approximately 32,865 POUNDS of Dimethyl phthalate for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Dimethyl phthalate for reporting year 2020. Please review your calculations and submit new report for Dimethyl phthalate for reporting year 2020, if needed.
- Your facility appeared to have received approximately 37,377 POUNDS of Styrene for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Styrene for reporting year 2020. Please review your calculations and submit new report for Styrene for reporting year 2020, if needed.
- Your facility appeared to have received approximately 380,700 POUNDS of Ethylene glycol for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Ethylene glycol for reporting year 2020. Please review your calculations and submit new report for Ethylene glycol for reporting year 2020, if needed.
- Your facility appeared to have received approximately 40,171 POUNDS of 1-Bromopropane for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for 1-Bromopropane for reporting year 2020. Please review your calculations and submit new report for 1-Bromopropane for reporting year 2020, if needed.
- Your facility appeared to have received approximately 419 POUNDS of Benzo[g,h,i]perylene for disposal / treatment, which is over otherwise use threshold amount of 10 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Benzo[g,h,i]perylene for reporting year 2020. Please review your calculations and submit new report for Benzo[g,h,i]perylene for reporting year 2020, if needed.
- Your facility appeared to have received approximately 433,270 POUNDS of N-Methyl-2-pyrrolidone for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for N-Methyl-2-pyrrolidone for reporting year 2020. Please review your calculations and submit new report for N-Methyl-2-pyrrolidone for reporting year 2020, if needed.
- Your facility appeared to have received approximately 58,102 POUNDS of 1,1,1-Trichloroethane for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for 1,1,1-Trichloroethane for reporting year 2020. Please review your calculations and submit new report for 1,1,1-Trichloroethane for reporting year 2020, if needed.
- Your facility appeared to have received approximately 59,902 POUNDS of Dibutyl phthalate for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Dibutyl phthalate for reporting year 2020. Please review your calculations and submit new report for Dibutyl phthalate for reporting year 2020, if needed.
- Your facility appeared to have received approximately 68,208 POUNDS of Formaldehyde for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Formaldehyde for reporting year 2020. Please review your calculations and submit new report for Formaldehyde for reporting year 2020, if needed.
- Your facility appeared to have received approximately 70,843 POUNDS of Acetonitrile for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for

reporting year 2020, but your facility did not appear to report for Acetonitrile for reporting year 2020. Please review your calculations and submit new report for Acetonitrile for reporting year 2020, if needed.

- Your facility appeared to have received approximately 873,912 POUNDS of Certain glycol ethers for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Certain glycol ethers for reporting year 2020. Please review your calculations and submit new report for Certain glycol ethers for reporting year 2020, if needed.

The source of these releases and quantities are listed below:

| Reported Chemical       | Response  | Reporting Year<br>(if applicable) |
|-------------------------|---|-----------------------------------|
| 1,1,1-Trichloroethane   | No Change   |                                   |
| Reason for Response     | According to information provided upon material receipt, the facility did not receive an amount of this chemical in excess of the relevant threshold.                   |                                   |
| 1-Bromopropane          | No Change   |                                   |
| Reason for Response     | According to information provided upon material receipt, the facility did not receive an amount of this chemical in excess of the relevant threshold.                   |                                   |
| 2-Mercaptobenzothiazole | No Change   |                                   |
| Reason for Response     | According to information provided upon material receipt, the facility did not receive an amount of this chemical in excess of the relevant threshold.                   |                                   |
| 4,4'-Methylenedianiline | No Change   |                                   |
| Reason for Response     | According to information provided upon material receipt, the facility did not receive an amount of this chemical in excess of the relevant threshold.                   |                                   |
| Acetonitrile            | New Submission  | 2020                              |
| Reason for Response     | After revisiting the compilation of data from profiles of received materials, the facility did receive and amount of this chemical in excess of the relevant threshold. |                                   |
| Benzo[g,h,i]perylene    | No Change   |                                   |
| Reason for Response     | According to information provided upon material receipt, the facility did not receive an amount of this chemical in excess of the relevant threshold.                   |                                   |
| Certain glycol ethers   | New Submission  | 2020                              |
| Reason for Response     | After revisiting the compilation of data from profiles of received materials, the facility did receive and amount of this chemical in excess of the relevant threshold. |                                   |
| Cyanide compounds       | New Submission  | 2020                              |
| Reason for Response     | After revisiting the compilation of data from profiles of received materials, the facility did receive and amount of this chemical in excess of the relevant threshold. |                                   |
| Dibutyl phthalate       | No Change   |                                   |
| Reason for Response     | According to information provided upon material receipt, the facility did not receive an amount of this chemical in excess of the relevant threshold.                   |                                   |
| Diethanolamine          | No Change   |                                   |

| Reported Chemical      | Response  | Reporting Year<br>(if applicable) |
|------------------------|---|-----------------------------------|
| Reason for Response    | According to information provided upon material receipt, the facility did not receive an amount of this chemical in excess of the relevant threshold.                   |                                   |
| Dimethyl phthalate     | No Change   |                                   |
| Reason for Response    | According to information provided upon material receipt, the facility did not receive an amount of this chemical in excess of the relevant threshold.                   |                                   |
| Ethylene glycol        | New Submission  | 2020                              |
| Reason for Response    | After revisiting the compilation of data from profiles of received materials, the facility did receive and amount of this chemical in excess of the relevant threshold. |                                   |
| Formaldehyde           | No Change   |                                   |
| Reason for Response    | According to information provided upon material receipt, the facility did not receive an amount of this chemical in excess of the relevant threshold.                   |                                   |
| Lithium carbonate      | No Change   |                                   |
| Reason for Response    | According to information provided upon material receipt, the facility did not receive an amount of this chemical in excess of the relevant threshold.                   |                                   |
| N-Methyl-2-pyrrolidone | New Submission  | 2020                              |
| Reason for Response    | After revisiting the compilation of data from profiles of received materials, the facility did receive and amount of this chemical in excess of the relevant threshold. |                                   |
| Nitric acid            | No Change   |                                   |
| Reason for Response    | According to information provided upon material receipt, the facility did not receive an amount of this chemical in excess of the relevant threshold.                   |                                   |
| Styrene                | No Change   |                                   |
| Reason for Response    | According to information provided upon material receipt, the facility did not receive an amount of this chemical in excess of the relevant threshold.                   |                                   |
| Tetrafluoroethylene    | No Change   |                                   |
| Reason for Response    | According to information provided upon material receipt, the facility did not receive an amount of this chemical in excess of the relevant threshold.                   |                                   |
| Xylene (mixed isomers) | No Change   |                                   |
| Reason for Response    | According to information provided upon material receipt, the facility did not receive an amount of this chemical in excess of the relevant threshold.                   |                                   |
| n-Butyl alcohol        | No Change   |                                   |
| Reason for Response    | According to information provided upon material receipt, the facility did not receive an amount of this chemical in excess of the relevant threshold.                   |                                   |

PFAS-NOT-F RY 2020

The source of these releases and quantities are listed below:

| Response               |   | Reporting Year<br>(if applicable) |
|------------------------|---|-----------------------------------|
| No Change              |   |                                   |
| Reason for<br>Response | According to information provided upon material receipt, the facility did not receive an amount of this chemical in excess of the relevant threshold. |                                   |

.....

**RINECO (72015RNC001007V)**  
**1007 VULCAN RD.- HASKELL, BENTON, AR 72015 (Region 6)**

**EPA Email – OG-1**

Headquarters Email

07/29/2021 01:19pm

From: *Velu Senthil*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(RINECO) (TRIFID: 72015RNC001007V)] for Reporting Year(s) 2020 - Due September 10, 2021

| Sent To            | E-Mail Address       |
|--------------------|----------------------|
| To: LARRY WILLIAMS | LWILLIAMS@RINECO.COM |
| To: CHEIKO STEWART | CSTEWART@RINECO.COM  |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

**Toxics Release Inventory (TRI) Data Quality Questions [(RINECO) (TRIFID: 72015RNC001007V)] for Reporting Year(s) 2020 - Due September 10, 2021**

Thu Jul 29 17:18:45 EDT 2021

Dear LARRY WILLIAMS and CHEIKO STEWART:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The for Ethanaminium, N,N-diethyl-N-methyl-2-[(2-methyl-1-oxo-2-propenyl)oxy]-, methyl sulfate, polymer with 2-ethylhexyl 2-methyl-2-propenoate,  $\alpha$ -fluoro- $\omega$ -[2-[(2-methyl-1-oxo-2-propenyl)oxy]ethyl]poly(difluoromethylene), 2-hydroxyethyl 2-methyl-2-propenoate and N-(hydroxymethyl)-2-propenamide and Phosphonic acid, perfluoro-C6-12-alkyl derivs. submitted to EPA from your facility: *RINECO* - (TRIFID: 72015RNC001007V) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Phosphonic acid, perfluoro-C6-12-alkyl derivs. to TRI for reporting year 2020, but might have received Phosphonic acid, perfluoro-C6-12-alkyl derivs. in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment, and also might have reported this chemical, Phosphonic acid, perfluoro-C6-12-alkyl derivs. to 2020 CDR as manufactured / imported. Please review and submit new report for Phosphonic acid, perfluoro-C6-12-alkyl derivs. for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Ethanaminium, N,N-diethyl-N-methyl-2-[(2-methyl-1-oxo-2-propenyl)oxy]-, methyl sulfate, polymer with 2-ethylhexyl 2-methyl-2-propenoate, α-fluoro-ω-[2-[(2-methyl-1-oxo-2-propenyl)oxy]ethyl]poly(difluoromethylene), 2-hydroxyethyl 2-methyl-2-propenoate and N-(hydroxymethyl)-2-propenamide to TRI for reporting year 2020, but might have received Ethanaminium, N,N-diethyl-N-methyl-2-[(2-methyl-1-oxo-2-propenyl)oxy]-, methyl sulfate, polymer with 2-ethylhexyl 2-methyl-2-propenoate, α-fluoro-ω-[2-[(2-methyl-1-oxo-2-propenyl)oxy]ethyl]poly(difluoromethylene), 2-hydroxyethyl 2-methyl-2-propenoate and N-(hydroxymethyl)-2-propenamide in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment, and also might have reported this chemical, Ethanaminium, N,N-diethyl-N-methyl-2-[(2-methyl-1-oxo-2-propenyl)oxy]-, methyl sulfate, polymer with 2-ethylhexyl 2-methyl-2-propenoate, α-fluoro-ω-[2-[(2-methyl-1-oxo-2-propenyl)oxy]ethyl]poly(difluoromethylene), 2-hydroxyethyl 2-methyl-2-propenoate and N-(hydroxymethyl)-2-propenamide to 2020 CDR as manufactured / imported. Please review and submit new report for Ethanaminium, N,N-diethyl-N-methyl-2-[(2-methyl-1-oxo-2-propenyl)oxy]-, methyl sulfate, polymer with 2-ethylhexyl 2-methyl-2-propenoate, α-fluoro-ω-[2-[(2-methyl-1-oxo-2-propenyl)oxy]ethyl]poly(difluoromethylene), 2-hydroxyethyl 2-methyl-2-propenoate and N-(hydroxymethyl)-2-propenamide for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=06a11321-0b62-4ea3-b6e6-14552d6abd16&target=421eaa49-1f5b-4bee-9a60-acc8333dcf75>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI

reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by September 10, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Velu Senthil at [senthil.velu@epa.gov](mailto:senthil.velu@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Velu Senthil

## EPA Email – OG-2

Headquarters Email

08/12/2021 08:49am

From: *Velu Senthil*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To            | E-Mail Address       |
|--------------------|----------------------|
| To: LARRY WILLIAMS | LWILLIAMS@RINECO.COM |
| To: CHEIKO STEWART | CSTEWART@RINECO.COM  |

Attachments:

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

Thu Aug 12 12:49:28 EDT 2021

Dear LARRY WILLIAMS and CHEIKO STEWART:

EPA would like to inform you that data quality issues raised for your facility [RINECO (TRIFID: 72015RNC001007V)] during reporting year 2020 Adhoc Data Quality Checks cycle are resolved for the following:

#### Reporting Year(s) Chemicals

2020 Ethanaminium, N,N-diethyl-N-methyl-2-[(2-methyl-1-oxo-2-propenyl)oxy]-, methyl sulfate, polymer with 2-ethylhexyl 2-methyl-2-propenoate,  $\alpha$ -fluoro- $\omega$ -[2-[(2-methyl-1-oxo-2-propenyl)oxy]ethyl]poly(difluoromethylene), 2-hydroxyethyl 2-methyl-2-propenoate and N-(hydroxymethyl)-2-propenamide and Phosphonic acid, perfluoro-C6-12-alkyl derivs.

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Velu Senthil

TRI Data Quality Program

US EPA

**Email sent on 08/12/2021 09:35am**

**RINECO - 72015RNC001007V submitted a web response on Aug 12, 2021 9:34:10 AM. A PDF copy of the web response is attached.**

### **Facility Response – IC-1**

Subject: Facility Response Form

Aug 12, 2021 9:34:10 AM

From: Gerald Browning

(501) 778-9089

gbrowning@heritage-enviro.com

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

PFAS-NOT RY 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Ethanaminium, N,N-diethyl-N-methyl-2-[(2-methyl-1-oxo-2-propenyl)oxy]-, methyl sulfate, polymer with 2-ethylhexyl 2-methyl-2-propenoate, α-fluoro-ω-[2-[(2-methyl-1-oxo-2-propenyl)oxy]ethyl]poly(difluoromethylene), 2-hydroxyethyl 2-methyl-2-propenoate and N-(hydroxymethyl)-2-propenamide to TRI for reporting year 2020, but might have received Ethanaminium, N,N-diethyl-N-methyl-2-[(2-methyl-1-oxo-2-propenyl)oxy]-, methyl sulfate, polymer with 2-ethylhexyl 2-methyl-2-propenoate, α-fluoro-ω-[2-[(2-methyl-1-oxo-2-propenyl)oxy]ethyl]poly(difluoromethylene), 2-hydroxyethyl 2-methyl-2-propenoate and N-(hydroxymethyl)-2-propenamide in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment, and also might have reported this chemical, Ethanaminium, N,N-diethyl-N-methyl-2-[(2-methyl-1-oxo-2-propenyl)oxy]-, methyl sulfate, polymer with 2-ethylhexyl 2-methyl-2-propenoate, α-fluoro-ω-[2-[(2-methyl-1-oxo-2-propenyl)oxy]ethyl]poly(difluoromethylene), 2-hydroxyethyl 2-methyl-2-propenoate and N-(hydroxymethyl)-2-propenamide to 2020 CDR as manufactured / imported. Please review and submit new report for Ethanaminium, N,N-diethyl-N-methyl-2-[(2-methyl-1-oxo-2-propenyl)oxy]-, methyl sulfate, polymer with 2-ethylhexyl 2-methyl-2-propenoate, α-fluoro-ω-[2-[(2-methyl-1-oxo-2-propenyl)oxy]ethyl]poly(difluoromethylene), 2-hydroxyethyl 2-methyl-2-propenoate and N-(hydroxymethyl)-2-propenamide for reporting year 2020, if required.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI),

and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Phosphonic acid, perfluoro-C6-12-alkyl derivs. to TRI for reporting year 2020, but might have received Phosphonic acid, perfluoro-C6-12-alkyl derivs. in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment, and also might have reported this chemical, Phosphonic acid, perfluoro-C6-12-alkyl derivs. to 2020 CDR as manufactured / imported. Please review and submit new report for Phosphonic acid, perfluoro-C6-12-alkyl derivs. for reporting year 2020, if required.

The source of these releases and quantities are listed below:

| Reported Chemical   | Reporting Year<br>(if Response applicable)   |
|---|--|
| Ethanaminium, N,N-diethyl-N-methyl-2-[(2-methyl-1-oxo-2-propenyl)oxy]-, methyl sulfate, polymer with 2-ethylhexyl 2-methyl-2-propenoate, $\alpha$ -fluoro- $\omega$ -[2-[(2-methyl-1-oxo-2-propenyl)oxy]ethyl]poly(difluoromethylene), 2-hydroxyethyl 2-methyl-2-propenoate and N-(hydroxymethyl)-2-propenamide | No Change  |
| Reason for Response   | Rineco is a TSDF that receives wastes from off-site; some contain listed toxic chemicals that are fuel blended for its heating value. The waste is repackaged into different container(s) and transferred off-site; to a Cement Kiln that burns the waste, for disposal or for treatment for destruction and not required to report because toxic chemicals are not distributed in commerce. Therefore, Rineco did not file a TRI Report for 2019 or 2020. |
| Phosphonic acid, perfluoro-C6-12-alkyl derivs.  | No Change  |
| Reason for Response   | Rineco is a TSDF that receives wastes from off-site; some contain listed toxic chemicals that are fuel blended for its heating value. The waste is repackaged into different container(s) and transferred off-site; to a Cement Kiln that burns the waste, for disposal or for treatment for destruction and not required to report because toxic chemicals are not distributed in commerce.   |

| Reported Chemical | Reporting<br>Year<br>(if<br>Response applicable)              |
|-------------------|---|
|                   | Therefore, Rineco did not file a TRI Report for 2019 or 2020. |

**US DOD USAF TINKER AFB (73145TNKRR8745E)  
72 ABW/CEIE 7535 FIFTH ST, BUILDING 400, TINKER AFB, OK  
73145 (Region 6)**

**EPA Email – OG-1**

Region 6 Email

03/07/2022 05:52am

From: *Morton Wakeland*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF TINKER AFB) (TRIFID: 73145TNKRR8745E)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To               | E-Mail Address            |
|-----------------------|---------------------------|
| Self: Morton Wakeland | wakeland.morton@epa.gov   |
| To: BRANDT FLEHARTY   | BRANDT.FLEHARTY@US.AF.MIL |
| To: JAMES BROWN       | JAMES.BROWN.191@US.AF.MIL |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1201 Elm Street Suite 500 DALLAS, TX 75270-2102

**Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF TINKER AFB) (TRIFID: 73145TNKRR8745E)]  
Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Mon Mar 07 10:52:28 EST 2022

Dear BRANDT FLEHARTY and JAMES BROWN:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Cadmium compounds, Chromium compounds (except for chromite ore mined in the Transvaal Region) and Lead compounds submitted to EPA from your facility: *US DOD USAF TINKER AFB* - (TRIFID: 73145TNKRR8745E) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- It appears your facility has sent approximately 263) shipments (sub eManifest IDs) totaling 1,907,642 pounds of hazardous waste listed containing Cadmium / Cadmium compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Cadmium / Cadmium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Cadmium / Cadmium compounds for reporting year 2020, if needed.
- It appears your facility has sent approximately 429) shipments (sub eManifest IDs) totaling 2,108,727 pounds of hazardous waste listed containing Chromium / Chromium compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Chromium / Chromium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Chromium / Chromium compounds for reporting year 2020, if needed.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 1 hazardous waste shipments (some e-Manifest #: 1) totaling 27,209 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.
- It appears your facility has sent approximately 59) shipments (sub eManifest IDs) totaling 600,891 pounds of hazardous waste listed containing Lead / Lead compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Lead / Lead compounds for reporting year 2020. Could you please review your calculations and submit a new report for Lead / Lead compounds for reporting year 2020, if needed.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=379f3d88-0dbd-4c5a-8ad3-560e5a3af9ff&target=a6d5a1e7-3591-47bc-bb93-aed9ca1843e2>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Morton Wakeland at wakeland.morton@epa.gov.

Thank you for your attention to this matter.

Sincerely,

Morton Wakeland

## **EPA Email – OG-2**

**From:** Wakeland, Morton <wakeland.morton@epa.gov>

**Sent:** Tuesday, April 26, 2022 8:37 AM

**To:** BROWN, JAMES A CIV USAF AFMC 72 ABW/CEIE <james.brown.191@us.af.mil>

**Subject:** RE: [Non-DoD Source] Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF TINKER AFB) (TRIFID: 73145TNKRR8745E)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

James, be sure to also respond in the HQ's email that was sent to you regarding the data quality check.

Many thanks,

Mort



Morton E. Wakeland, Jr. ("Mort"), Ph.D.

**EPCRA Section 313 Enforcement and TRI**

**Program Coordinator**

**U.S. EPA Region 6**

**Compliance Assurance and Enforcement**

**Division (ECD)**

**Waste Enforcement Branch (ECDS)**

**Toxics Section (ECDST)**

**Dallas, Texas 75270**

**(214) 665-8116**

## **Facility Response – IC-1**

**From:** BROWN, JAMES A CIV USAF AFMC 72 ABW/CEIE <[james.brown.191@us.af.mil](mailto:james.brown.191@us.af.mil)>  
**Sent:** Monday, April 25, 2022 3:03 PM  
**To:** Wakeland, Morton <[wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov)>  
**Subject:** RE: [Non-DoD Source] Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF TINKER AFB) (TRIFID: 73145TNKRR8745E)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

Good Afternoon Morton,

It's been a few years since our last email exchange. We reviewed our TRI threshold calculations for reporting year 2020. Please see the attached letter with our TRI threshold evaluation.

Sometimes our Air Force firewall blocks attachments to non-DoD email addresses. If this occurs please contact our office and we'll make other arrangements to deliver the requested data.

Respectfully,

James A. Brown

Air Quality Program Manager | 72 ABW/CEIE

Comm: (405) 734-4548 | DSN: 884-4548 | Fax: (405) 734-9302

Please consider the environment before printing this email

**From:** [wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov) <[wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov)>  
**Sent:** Monday, March 7, 2022 3:27 PM  
**To:** FLEHARTY, BRANDT L CIV USAF AFMC 72 ABW/CEI <[brandt.fleharty@us.af.mil](mailto:brandt.fleharty@us.af.mil)>;  
[wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov); BROWN, JAMES A CIV USAF AFMC 72 ABW/CEIE  
<[james.brown.191@us.af.mil](mailto:james.brown.191@us.af.mil)>  
**Subject:** [Non-DoD Source] Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF TINKER AFB) (TRIFID: 73145TNKRR8745E)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1201 Elm Street Suite 500 DALLAS, TX 75270-2102

**Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF TINKER AFB) (TRIFID: 73145TNKRR8745E)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Mon Mar 07 10:52:28 EST 2022

Dear BRANDT FLEHARTY and JAMES BROWN:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Cadmium compounds, Chromium compounds (except for chromite ore mined in the Transvaal Region) and Lead compounds submitted to EPA from your facility: *US DOD USAF TINKER AFB* - (TRIFID: 73145TNKRR8745E) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- It appears your facility has sent approximately 263) shipments (sub eManifest IDs) totaling 1,907,642 pounds of hazardous waste listed containing Cadmium / Cadmium compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Cadmium / Cadmium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Cadmium / Cadmium compounds for reporting year 2020, if needed.
- It appears your facility has sent approximately 429) shipments (sub eManifest IDs) totaling 2,108,727 pounds of hazardous waste listed containing Chromium / Chromium compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Chromium / Chromium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Chromium / Chromium compounds for reporting year 2020, if needed.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 1 hazardous waste shipments (some e-Manifest #s: 1) totaling 27,209 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.
- It appears your facility has sent approximately 59) shipments (sub eManifest IDs) totaling 600,891 pounds of hazardous waste listed containing Lead / Lead compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Lead / Lead compounds for reporting year 2020. Could you please review your calculations and submit a new report for Lead / Lead compounds for reporting year 2020, if needed.

***How do I respond to this inquiry? (Step 1 is always required)***

*Step 1:*

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=379f3d88-0dbd-4c5a-8ad3-560e5a3af9ff&target=a6d5a1e7-3591-47bc-bb93-aed9ca1843e2>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

*Step 2:*

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup,

prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb).  
<https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms>  
[epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Morton Wakeland at [wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Morton Wakeland

### EPA Email – OG-3

Headquarters Email

05/01/2022 12:22pm

From: *Velu Senthil*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To                     | E-Mail Address            |
|-----------------------------|---------------------------|
| Cc: wakeland.morton@epa.gov | wakeland.morton@epa.gov   |
| To: BRANDT FLEHARTY         | BRANDT.FLEHARTY@US.AF.MIL |
| To: JAMES BROWN             | JAMES.BROWN.191@US.AF.MIL |

Attachments:

#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

Sun May 01 16:22:16 UTC 2022

Dear BRANDT FLEHARTY and JAMES BROWN:

EPA would like to inform you that data quality issues raised for your facility [US DOD USAF TINKER AFB (TRIFID: 73145TNKRR8745E)] during reporting year 2020 Adhoc Data Quality Checks are resolved for the following:

#### Reporting Year(s) Chemicals

2020 Cadmium compounds, Chromium compounds (except for chromite ore mined in the Transvaal Region) and Lead compounds

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Velu Senthil

TRI Data Quality Program

US EPA

**Email sent on 04/28/2022 10:35pm**

---

US DOD USAF TINKER AFB - 73145TNKRR8745E submitted a web response on Apr 28, 2022 10:35:04 PM. A PDF copy of the web response is attached.

### **Facility Response – IC-2**

Subject: Facility Response Form

Apr 28, 2022 10:35:04 PM

From: James Brown

(405) 734-4548 james.brown.191@us.af.mil

Contractor Company Name: Tinker Air Force Base

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

EMAN-RNO RY 2020

- It appears your facility has sent approximately 263) shipments (sub eManifest IDs) totaling 1,907,642 pounds of hazardous waste listed containing Cadmium / Cadmium compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Cadmium / Cadmium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Cadmium / Cadmium compounds for reporting year 2020, if needed.
- It appears your facility has sent approximately 429) shipments (sub eManifest IDs) totaling 2,108,727 pounds of hazardous waste listed containing Chromium / Chromium compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Chromium / Chromium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Chromium / Chromium compounds for reporting year 2020, if needed.
- It appears your facility has sent approximately 59) shipments (sub eManifest IDs) totaling 600,891 pounds of hazardous waste listed containing Lead / Lead compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Lead / Lead compounds for reporting year 2020. Could you please review your calculations and submit a new report for Lead / Lead compounds for reporting year 2020, if needed.

The source of these releases and quantities are listed below:

| Reported Chemical  | Reporting Year (if Response applicable)  |
|--|--|
| Cadmium compounds  | No Change  |
| Reason for Response  | In accordance with §372.30(a), EPA Form 9350-1 (Form R) submission is only required when an applicable threshold is exceeded. Tinker conducted a comprehensive review of our 2020 reporting year TRI calculations and determined that cadmium/cadmium compounds didn't exceeded the regulatory thresholds for reporting. We had 1 lbs. of manufacture, 0 lbs. of processed and 33 lbs. of otherwise used which is well under the applicable thresholds of 25,000, 25,000, and 10,000 lbs., respectively. Tinker applied all applicable exemptions listed in §372.38 when calculating the amounts for manufactured, processed and otherwise used. |
| Chromium compounds (except for chromite ore mined in the Transvaal Region) | No Change  |
| Reason for Response  | In accordance with §372.30(a), EPA Form 9350-1 (Form R) submission is only required when an applicable threshold is exceeded. Tinker conducted a comprehensive review of our 2020 reporting year TRI calculations and determined that chromium/chromium compounds didn't exceeded the regulatory thresholds for reporting. We had 986 lbs. of manufacture, 14,834 lbs. of processed and 844 lbs. of otherwise used which is well under the applicable thresholds of 25,000, 25,000, and 10,000 lbs., respectively. Tinker applied all applicable exemptions listed in §372.38 when calculating the amounts                                       |

| Reported Chemical   | Reporting Year (if Response applicable)  |
|---------------------|--|
|                     | for manufactured, processed and otherwise used.  |
| Lead compounds      | No Change  |
| Reason for Response | In accordance with §372.30(a), EPA Form 9350-1 (Form R) submission is only required when an applicable threshold is exceeded. Tinker conducted a comprehensive review of our 2020 reporting year TRI calculations and determined that lead/lead compounds didn't exceeded the regulatory thresholds for reporting. We had 11.9 lbs. of manufacture, 15.8 lbs. of processed and 5.3 lbs. of otherwise used which is well under the applicable thresholds of 100, 100, and 100 lbs., respectively. Tinker applied all applicable exemptions listed in §372.38 when calculating the amounts for manufactured, processed and otherwise used. |

PFAS-NOT-F RY 2020

The source of these releases and quantities are listed below:

| Response            | Reporting Year (if applicable)  |
|---------------------|---|
| No Change           |   |
| Reason for Response | In accordance with §372.30(a), EPA Form 9350-1 (Form R) submission is only required when an applicable threshold is exceeded. Tinker conducted a comprehensive review of our 2020 reporting year TRI calculations and determined that PFAS compounds didn't exceeded the regulatory thresholds for reporting. We had 0 lbs. of manufacture, 0 lbs. of processed and 0 lbs. of otherwise used which is well under the applicable thresholds of 100, 100, and 100 lbs., respectively. Tinker applied all applicable exemptions listed in §372.38 when calculating the amounts for manufactured, processed and otherwise used. |

.....

**VALERO REFINING CO -OKLAHOMA VALERO ARDMORE  
REFINERY (73401TTLPTHIGHW)  
ONE VALERO WAY, ARDMORE, OK 73401 (Region 6)**

**EPA Email – OG-1**

Region 6 Email

03/07/2022 05:53am

From: *Morton Wakeland*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(VALERO REFINING CO -OKLAHOMA VALERO ARDMORE REFINERY) (TRIFID: 73401TTLPTHIGHW)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To               | E-Mail Address          |
|-----------------------|-------------------------|
| Self: Morton Wakeland | wakeland.morton@epa.gov |
| To: GREG ELLIOTT      | GREG.ELLIOTT@VALERO.COM |
| To: GREG ELLIOTT      | GREG.ELLIOTT@VALERO.COM |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1201 Elm Street Suite 500 DALLAS, TX 75270-2102

**Toxics Release Inventory (TRI) Data Quality Questions [(VALERO REFINING CO -OKLAHOMA VALERO ARDMORE REFINERY) (TRIFID: 73401TTLPTHIGHW)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Mon Mar 07 10:53:14 EST 2022

Dear GREG ELLIOTT:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: VALERO REFINING CO -OKLAHOMA VALERO ARDMORE REFINERY) - (TRIFID: 73401TTLPTHIGHW) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 5 hazardous waste shipments (some e-Manifest #: 5) totaling 145,785 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=1cc76c7d-7385-48b1-a3ae-af30cba2a1f2&target=8a9748c7-361b-4a6d-80e6-9eff9c29acc1>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Morton Wakeland at [wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Morton Wakeland

**EPA Email – OG-2**

Headquarters Email

03/29/2022 11:00am

From: *Velu Senthil*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To                     | E-Mail Address          |
|-----------------------------|-------------------------|
| Cc: wakeland.morton@epa.gov | wakeland.morton@epa.gov |
| To: GREG ELLIOTT            | GREG.ELLIOTT@VALERO.COM |
| To: GREG ELLIOTT            | GREG.ELLIOTT@VALERO.COM |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

Tue Mar 29 15:00:15 UTC 2022

Dear GREG ELLIOTT:

EPA would like to inform you that data quality issues raised for your facility [VALERO REFINING CO -OKLAHOMA VALERO ARDMORE REFINERY (TRIFID: 73401TTLPTHIGHW)] during reporting year 2020 Adhoc Data Quality Checks are resolved for the following:

Reporting Year(s) Chemicals

2020 No chemicals

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Velu Senthil

TRI Data Quality Program

US EPA

**Email sent on 03/21/2022 08:07am**

VALERO REFINING CO -OKLAHOMA VALERO ARDMORE REFINERY - 73401TTLPTHIGHW submitted a web response on Mar 21, 2022 12:07:12 PM. A PDF copy of the web response is attached.

**Facility Response – IC-1**

Subject: Facility Response Form

From: Greg Elliott

(580) 221-6232

Mar 21, 2022 12:07:12 PM

greg.elliott@valero.com

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

PFAS-NOT-F RY 2020

The source of these releases and quantities are listed below:

| Response            | Reporting Year<br>(if applicable)  |
|---------------------|--|
| No Change           |  |
| Reason for Response | On September 28, 2020, a spill occurred at the Valero Ardmore Refinery. To mitigate the potential exposure to employees, 200 gallons of a 1% PFAS foam was applied to the spill for vapor suppression. Based on the volume of foam applied, there was less than 100 pounds of PFAS released of as part of this incident. Therefore, PFAS was not included in the TRI as it did not meet the reporting threshold. |

.....

# MOLDED FIBER GLASS COMPANIES/TEXAS (76240MLDDF3333N) 3333 N I-35 BLDG 5, GAINESVILLE, TX 76240 (Region 6)

## EPA Email – OG-1

Region 6 Email

03/07/2022 05:40am

From: *Morton Wakeland*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(MOLDED FIBER GLASS COMPANIES/TEXAS) (TRIFID: 76240MLDDF3333N)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To               | E-Mail Address              |
|-----------------------|-----------------------------|
| Self: Morton Wakeland | wakeland.morton@epa.gov     |
| To: EDWARD TRENN      | ETRENN@MOLDEDFIBERGLASS.COM |
| To: ISRAEL BARAJAS    | IBARAJAS@MFGTEXAS.COM       |

Attachments:

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

1201 Elm Street Suite 500 DALLAS, TX 75270-2102

**Toxics Release Inventory (TRI) Data Quality Questions [(MOLDED FIBER GLASS COMPANIES/TEXAS) (TRIFID: 76240MLDDF3333N)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Mon Mar 07 10:40:44 EST 2022

Dear ISRAEL BARAJAS and EDWARD TRENN:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: *MOLDED FIBER GLASS COMPANIES/TEXAS* - (TRIFID: 76240MLDDF3333N) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 12 hazardous waste shipments (some e-Manifest #s: 12) totaling 15,982 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=c6a03763-fbcb-4fd1-b07c-961d0686c9a3&target=a36b2366-9c3e-48e5-af83-aff3f6bf3e3f>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Morton Wakeland at [wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Morton Wakeland

**EPA Email – OG-2**

Headquarters Email

04/04/2022 05:34pm

From: *Velu Senthil*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To                     | E-Mail Address                |
|-----------------------------|-------------------------------|
| Cc: wakeland.morton@epa.gov | wakeland.morton@epa.gov       |
| To: EDWARD TRENN            | ETRENN@MOLDED FIBER GLASS.COM |
| To: ISRAEL BARAJAS          | IBARAJAS@MFG TEXAS.COM        |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

Mon Apr 04 21:34:01 UTC 2022

Dear ISRAEL BARAJAS and EDWARD TRENN:

EPA would like to inform you that data quality issues raised for your facility [MOLDED FIBER GLASS COMPANIES/TEXAS (TRIFID: 76240MLDDF3333N)] during reporting year 2020 Adhoc Data Quality Checks are resolved for the following:

Reporting Year(s) Chemicals

2020 No chemicals

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Velu Senthil

TRI Data Quality Program

US EPA

**Email sent on 03/07/2022 10:40am**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1201 Elm Street Suite 500 DALLAS, TX 75270-2102

**Toxics Release Inventory (TRI) Data Quality Questions [(MOLDED FIBER GLASS COMPANIES/TEXAS) (TRIFID: 76240MLDDF3333N)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Mon Mar 07 10:40:44 EST 2022

Dear ISRAEL BARAJAS and EDWARD TRENN:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: *MOLDED FIBER GLASS COMPANIES/TEXAS* - (TRIFID: 76240MLDDF3333N) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 12 hazardous waste shipments (some e-Manifest #: 12) totaling 15,982 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

*Step 1:*

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=c6a03763-fbcb-4fd1-b07c-961d0686c9a3&target=a36b2366-9c3e-48e5-af83-aff3f6bf3e3f>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

*Step 2:*

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Morton Wakeland at wakeland.morton@epa.gov.

Thank you for your attention to this matter.

Sincerely,

Morton Wakeland

### Facility Response – IC-1

Subject: Facility Response Form

Mar 21, 2022 6:05:43 PM

From: Israel Barajas

(194) 073-65421 ibarajas@mfgtx.com

Contractor Company Name: Molded Fiber Glass Co./TX

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

PFAS-NOT-F RY 2020

The source of these releases and quantities are listed below:

| Response            | Reporting Year<br>(if applicable)                            |
|---------------------|--|
| No Change           |  |
| Reason for Response | We do not use, process or dispose chemicals containing PFAS. |

.....

**PHILIP RECLAMATION SERVICES HOUSTON INC (DBA  
ELTEX) (77028PHLPR4050H)  
4050 HOMESTEAD RD, HOUSTON, TX 77028 (Region 6)**

**EPA Email – OG-1**

Region 6 Email

03/07/2022 05:44am

From: *Morton Wakeland*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(PHILIP RECLAMATION SERVICES HOUSTON INC (DBA ELTEX)) (TRIFID: 77028PHLPR4050H)] for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To               | E-Mail Address          |
|-----------------------|-------------------------|
| Self: Morton Wakeland | wakeland.morton@epa.gov |
| To: JUAN ALVARADO     | NA                      |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1201 Elm Street Suite 500 DALLAS, TX 75270-2102

**Toxics Release Inventory (TRI) Data Quality Questions [(PHILIP RECLAMATION SERVICES HOUSTON INC (DBA ELTEX)) (TRIFID: 77028PHLPR4050H)] for Reporting Year(s) 2020 - Due April 29, 2022**

Mon Mar 07 10:43:56 EST 2022

Dear JUAN ALVARADO:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The for NO\_VALUE submitted to EPA from your facility: PHILIP RECLAMATION SERVICES HOUSTON INC (DBA ELTEX)) - (TRIFID: 77028PHLPR4050H) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have received approximately 10 hazardous waste shipments (some e-Manifest #s: 10) totaling 27,785 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=0203c6f9-f5ee-44bd-a357-6d1da375a236&target=c8735ab8-d6cd-4662-9c1c-f77c40941696>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Morton Wakeland at [wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Morton Wakeland

.....

**SET ENVIRONMENTAL INC (77087STNVR5743C)**  
**5743 CHESWOOD ST, HOUSTON, TX 77087 (Region 6)**

**EPA Email – OG-1**

Region 6 Email

03/07/2022 05:48am

From: *Morton Wakeland*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(SET ENVIRONMENTAL INC) (TRIFID: 77087STNVR5743C)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To               | E-Mail Address          |
|-----------------------|-------------------------|
| Self: Morton Wakeland | wakeland.morton@epa.gov |
| To: DANIEL A. DIDIER  | DDIDIER@SETENV.COM      |
| To: DANIEL A. DIDIER  | DDIDIER@SETENV.COM      |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1201 Elm Street Suite 500 DALLAS, TX 75270-2102

**Toxics Release Inventory (TRI) Data Quality Questions [(SET ENVIRONMENTAL INC) (TRIFID: 77087STNVR5743C)]**  
**Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Mon Mar 07 10:48:12 EST 2022

Dear DANIEL A. DIDIER:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Carbon tetrachloride, Certain glycol ethers, Chlorine, Chloroform, Chromium compounds (except for chromite ore mined in the Transvaal Region), Hydrogen cyanide, Lead compounds, Methanol, Naphthalene, Nickel compounds, Phenol, Toluene, Xylene (mixed isomers) and Zinc compounds submitted to EPA from your facility: SET ENVIRONMENTAL INC) - (TRIFID: 77087STNVR5743C) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- It appears your facility has sent approximately 301 shipments (sub eManifest IDs) totaling 1,214,100 pounds of hazardous waste listed containing Xylenes to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Xylenes for reporting year 2020. Could you please review your calculations and submit a new report for Xylenes for reporting year 2020, if needed.
- Your facility appeared to have received approximately 3,653,547 POUNDS of Methanol for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Methanol for reporting year 2020. Please review your calculations and submit new report for Methanol for reporting year 2020, if needed.
- Your facility appeared to have received approximately 25,954 POUNDS of Hydrogen cyanide for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Hydrogen cyanide for reporting year 2020. Please review your calculations and submit new report for Hydrogen cyanide for reporting year 2020, if needed.
- Your facility appeared to have received approximately 178,755 POUNDS of Toluene for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Toluene for reporting year 2020. Please review your calculations and submit new report for Toluene for reporting year 2020, if needed.
- Your facility appeared to have received approximately 13,070 POUNDS of LEAD or LEAD COMPOUNDS for disposal / treatment, which is over otherwise use threshold amount of 100 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for either LEAD or LEAD COMPOUNDS for reporting year 2020. Please REVIEW your calculations and submit new report for COPPER or COPPER COMPOUNDS for reporting year 2020, if needed.
- It appears your facility has sent approximately 71 shipments (sub eManifest IDs) totaling 140,043 pounds of hazardous waste listed containing Methanol to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Methanol for reporting year 2020. Could you please review your calculations and submit a new report for Methanol for reporting year 2020, if needed.
- Your facility appeared to have received approximately 39,042 POUNDS of Chlorine for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Chlorine for reporting year 2020. Please review your calculations and submit new report for Chlorine for reporting year 2020, if needed.
- It appears your facility has sent approximately 65 shipments (sub eManifest IDs) totaling 171,732 pounds of hazardous waste listed containing Carbon tetrachloride to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Carbon tetrachloride for reporting year 2020. Could you please review your calculations and submit a new report for Carbon tetrachloride for reporting year 2020, if needed.
- Your facility appeared to have received approximately 123,550 POUNDS of Chloroform for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Chloroform for reporting year 2020. Please review your calculations and submit new report for Chloroform for reporting year 2020, if needed.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have received approximately 7 hazardous waste shipments (some e-Manifest #: 7) totaling 23,029 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.
- Your facility appeared to have received approximately 31,496 POUNDS of Naphthalene for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Naphthalene for reporting year 2020.

Please review your calculations and submit new report for Naphthalene for reporting year 2020, if needed.

- It appears your facility has received approximately 77) shipments (sub eManifest IDs) totaling 113,289 pounds of hazardous waste listed containing Xylenes from several TRI facilities for reporting year 2020, but your facility does not appear to have reported for Xylenes for reporting year 2020. Could you please review your calculations and submit a new report for Xylenes for reporting year 2020, if needed.
- It appears your facility has received approximately 95) shipments (sub eManifest IDs) totaling 117,107 pounds of hazardous waste listed containing Chromium / Chromium compounds from several TRI facilities for reporting year 2020, but your facility does not appear to have reported for Chromium / Chromium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Chromium / Chromium compounds for reporting year 2020, if needed.
- Your facility appeared to have received approximately 75,242 POUNDS of ZINC or ZINC COMPOUNDS for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for either ZINC or ZINC COMPOUNDS for reporting year 2020. Please REVIEW your calculations and submit new report for ZINC or ZINC COMPOUNDS for reporting year 2020, if needed.
- It appears your facility has sent approximately 56) shipments (sub eManifest IDs) totaling 131,930 pounds of hazardous waste listed containing Chloroform to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Chloroform for reporting year 2020. Could you please review your calculations and submit a new report for Chloroform for reporting year 2020, if needed.
- Your facility appeared to have received approximately 17,988 POUNDS of NICKEL or NICKEL COMPOUNDS for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for either NICKEL or NICKEL COMPOUNDS for reporting year 2020. Please REVIEW your calculations and submit new report for NICKEL or NICKEL COMPOUNDS for reporting year 2020, if needed.
- Your facility appeared to have received approximately 20,832 POUNDS of Certain glycol ethers for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Certain glycol ethers for reporting year 2020. Please review your calculations and submit new report for Certain glycol ethers for reporting year 2020, if needed.
- It appears your facility has received approximately 95) shipments (sub eManifest IDs) totaling 188,024 pounds of hazardous waste listed containing Methanol from several TRI facilities for reporting year 2020, but your facility does not appear to have reported for Methanol for reporting year 2020. Could you please review your calculations and submit a new report for Methanol for reporting year 2020, if needed.
- Your facility appeared to have received approximately 22,190 POUNDS of Phenol for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Phenol for reporting year 2020. Please review your calculations and submit new report for Phenol for reporting year 2020, if needed.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=5d9a1110-7b48-4329-8810-a898fd11ce38&target=093509f5-291c-4630-af43-88a98d150333>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Morton Wakeland at wakeland.morton@epa.gov.

Thank you for your attention to this matter.

Sincerely,

Morton Wakeland

## **EPA Email – OG-2**

**From:** Wakeland, Morton <wakeland.morton@epa.gov>

**Sent:** Wednesday, April 13, 2022 1:42 PM

**To:** Daniel Didier <Ddidier@setenv.com>

**Subject:** RE: Facility Response to TRI Data Quality - SET ENVIRONMENTAL INC - 77087STNVR5743C

I cannot find a copy of the questionnaire sent to Set Environmental in our database.

for TRIFID: 77087STNVR5743C

Am not understanding your question. If methanol did not exceed threshold for reporting and you did not report, then what is the issue?

Perhaps I misread your note?

You simply respond with data is correct as is, i.e., no report for methanol is necessary.

Mort



**Morton E. Wakeland, Jr. ("Mort"), Ph.D.**

**EPCRA Section 313 Enforcement and TRI**

Program Coordinator

U.S. EPA Region 6

Compliance Assurance and Enforcement

Division (ECD)

Waste Enforcement Branch (ECDS)

Toxics Section (ECDST)

Dallas, Texas 75270

(214) 665-8116

### Facility Response – IC-1

**From:** Daniel Didier <[Ddidier@setenv.com](mailto:Ddidier@setenv.com)>

**Sent:** Wednesday, April 13, 2022 12:31 PM

**To:** Wakeland, Morton <[wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov)>

**Subject:** RE: Facility Response to TRI Data Quality - SET ENVIRONMENTAL INC - 77087STNVR5743C

When we requested to review our data for possible errors, it appeared that SET Environmental made a mistake in not reporting otherwise use of Methanol. However, we did not exceed any reporting threshold for Methanol. How do I go back and correct that there is no error?

**From:** TRI QuEST <[noreply@epacdx.net](mailto:noreply@epacdx.net)>

**Sent:** Tuesday, March 8, 2022 9:19 AM

**To:** Daniel Didier <[Ddidier@setenv.com](mailto:Ddidier@setenv.com)>

**Subject:** Facility Response to TRI Data Quality - SET ENVIRONMENTAL INC - 77087STNVR5743C

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

SET ENVIRONMENTAL INC - 77087STNVR5743C submitted a web response on Mar 8, 2022 3:13:56 PM. A PDF copy of the web response is attached.

### Facility Response – IC-2

Subject: Facility Response Form

Mar 8, 2022 3:13:56 PM

From: Daniel A. Didier

(713) 641-7574 ddidier@setenv.com

Contractor Company Name: SET Environmental, Inc.

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

EMAN-RNO RY 2020

- It appears your facility has sent approximately 301) shipments (sub eManifest IDs) totaling 1,214,100 pounds of hazardous waste listed containing Xylenes to offsite location(s) for reporting year 2020, but

your facility does not appear to have reported for Xylenes for reporting year 2020. Could you please review your calculations and submit a new report for Xylenes for reporting year 2020, if needed.

- It appears your facility has sent approximately 56) shipments (sub eManifest IDs) totaling 131,930 pounds of hazardous waste listed containing Chloroform to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Chloroform for reporting year 2020. Could you please review your calculations and submit a new report for Chloroform for reporting year 2020, if needed.
- It appears your facility has sent approximately 65) shipments (sub eManifest IDs) totaling 171,732 pounds of hazardous waste listed containing Carbon tetrachloride to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Carbon tetrachloride for reporting year 2020. Could you please review your calculations and submit a new report for Carbon tetrachloride for reporting year 2020, if needed.
- It appears your facility has sent approximately 71) shipments (sub eManifest IDs) totaling 140,043 pounds of hazardous waste listed containing Methanol to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Methanol for reporting year 2020. Could you please review your calculations and submit a new report for Methanol for reporting year 2020, if needed.

The source of these releases and quantities are listed below:

| Reported Chemical      | Response  | Reporting Year<br>(if applicable) |
|------------------------|---|-----------------------------------|
| Carbon tetrachloride   | No Change   |                                   |
| Reason for Response    | This chemical was not manufactured, processed or otherwise used. The chemical is a constituent in waste that was received in drums for storage and shipped off-site for final disposal with no other activity conducted at this site. |                                   |
| Chloroform             | No Change   |                                   |
| Reason for Response    | This chemical was not manufactured, processed or otherwise used. The chemical is a constituent in waste that was received in drums for storage and shipped off-site for final disposal with no other activity conducted at this site. |                                   |
| Methanol               | New Submission  | 2020                              |
| Reason for Response    | We did otherwise use more than 10,000 pounds of methanol in 2020.   |                                   |
| Xylene (mixed isomers) | No Change   |                                   |
| Reason for Response    | This chemical was not manufactured, processed or otherwise used. The chemical is a constituent in waste that was received in drums for storage and shipped off-site for final disposal with no other activity conducted at this site. |                                   |

EMAN-TNO RY 2020

- It appears your facility has received approximately 77) shipments (sub eManifest IDs) totaling 113,289 pounds of hazardous waste listed containing Xylenes from several TRI facilities for reporting year 2020, but your facility does not appear to have reported for Xylenes for reporting year 2020. Could you please review your calculations and submit a new report for Xylenes for reporting year 2020, if needed.
- It appears your facility has received approximately 95) shipments (sub eManifest IDs) totaling 117,107 pounds of hazardous waste listed containing Chromium / Chromium compounds from several TRI facilities for reporting year 2020, but your facility does not appear to have reported for Chromium / Chromium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Chromium / Chromium compounds for reporting year 2020, if needed.
- It appears your facility has received approximately 95) shipments (sub eManifest IDs) totaling 188,024 pounds of hazardous waste listed containing Methanol from several TRI facilities for reporting year 2020,

but your facility does not appear to have reported for Methanol for reporting year 2020. Could you please review your calculations and submit a new report for Methanol for reporting year 2020, if needed.

The source of these releases and quantities are listed below:

| Reported Chemical  | Reporting Year (if applicable)<br>Response  |
|--|---|
| Chromium compounds (except for chromite ore mined in the Transvaal Region) | No Change   |
| Reason for Response  | We did not exceed the manufacture, production or otherwise use or thresholds for this compound which is based on the volume of this compounds chemically treated.   |
| Methanol   | New 2020 Submission   |
| Reason for Response  | We did otherwise use more than 10,000 pounds of methanol in 2020.   |
| Xylene (mixed isomers)   | No Change   |
| Reason for Response  | This chemical was not manufactured, processed or otherwise used. The chemical is a constituent in waste that was received in drums for storage and shipped off-site for final disposal with no other activity conducted at this site. |

#### OFF-TSD-MET-NON RY 2020

- Your facility appeared to have received approximately 13,070 POUNDS of LEAD or LEAD COMPOUNDS for disposal / treatment, which is over otherwise use threshold amount of 100 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for either LEAD or LEAD COMPOUNDS for reporting year 2020. Please REVIEW your calculations and submit new report for COPPER or COPPER COMPOUNDS for reporting year 2020, if needed.
- Your facility appeared to have received approximately 17,988 POUNDS of NICKEL or NICKEL COMPOUNDS for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for either NICKEL or NICKEL COMPOUNDS for reporting year 2020. Please REVIEW your calculations and submit new report for NICKEL or NICKEL COMPOUNDS for reporting year 2020, if needed.
- Your facility appeared to have received approximately 75,242 POUNDS of ZINC or ZINC COMPOUNDS for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for either ZINC or ZINC COMPOUNDS for reporting year 2020. Please REVIEW your calculations and submit new report for ZINC or ZINC COMPOUNDS for reporting year 2020, if needed.

The source of these releases and quantities are listed below:

| Reported Chemical   | Response  | Reporting Year<br>(if applicable) |
|---------------------|---|-----------------------------------|
| Lead compounds      | No Change   |                                   |
| Reason for Response | We did not exceed the otherwise use threshold for this compound which is based on the volume of this compound chemically treated. |                                   |
| Nickel compounds    | No Change   |                                   |
| Reason for Response | We did not exceed the otherwise use threshold for this compound which is based on the volume of this compound chemically treated. |                                   |
| Zinc compounds      | No Change   |                                   |
| Reason for Response | We did not exceed the otherwise use threshold for this compound which is based on the volume of this compound chemically treated. |                                   |

#### OFF-TSD-NON RY 2020

- Your facility appeared to have received approximately 123,550 POUNDS of Chloroform for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Chloroform for reporting year 2020. Please review your calculations and submit new report for Chloroform for reporting year 2020, if needed.
- Your facility appeared to have received approximately 178,755 POUNDS of Toluene for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Toluene for reporting year 2020. Please review your calculations and submit new report for Toluene for reporting year 2020, if needed.
- Your facility appeared to have received approximately 20,832 POUNDS of Certain glycol ethers for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Certain glycol ethers for reporting year 2020. Please review your calculations and submit new report for Certain glycol ethers for reporting year 2020, if needed.
- Your facility appeared to have received approximately 22,190 POUNDS of Phenol for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Phenol for reporting year 2020. Please review your calculations and submit new report for Phenol for reporting year 2020, if needed.
- Your facility appeared to have received approximately 25,954 POUNDS of Hydrogen cyanide for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Hydrogen cyanide for reporting year 2020. Please review your calculations and submit new report for Hydrogen cyanide for reporting year 2020, if needed.
- Your facility appeared to have received approximately 3,653,547 POUNDS of Methanol for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Methanol for reporting year 2020. Please review your calculations and submit new report for Methanol for reporting year 2020, if needed.
- Your facility appeared to have received approximately 31,496 POUNDS of Naphthalene for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Naphthalene for reporting year 2020. Please review your calculations and submit new report for Naphthalene for reporting year 2020, if needed.
- Your facility appeared to have received approximately 39,042 POUNDS of Chlorine for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Chlorine for reporting year 2020. Please review your calculations and submit new report for Chlorine for reporting year 2020, if needed.

The source of these releases and quantities are listed below:

| Reported Chemical     | Response  | Reporting Year<br>(if applicable) |
|-----------------------|---|-----------------------------------|
| Certain glycol ethers | No Change   |                                   |
| Reason for Response   | This chemical was not manufactured, processed or otherwise used. The chemical is a constituent in waste that was received in drums for storage and shipped off-site for final disposal with no other activity conducted at this site. |                                   |
| Chlorine              | No Change   |                                   |
| Reason for Response   | The otherwise use threshold of 10,000 applies to this chemical and is based on the quantity chemically treated in 2020. Quantity treated did not exceed the threshold.  |                                   |
| Chloroform            | No Change   |                                   |
| Reason for Response   | This chemical was not manufactured, processed or otherwise used. The chemical is a constituent in waste that was received in drums for storage and shipped off-site for final disposal with no other activity conducted at this site. |                                   |
| Hydrogen cyanide      | No Change   |                                   |
| Reason for Response   | This chemical was not manufactured, processed or otherwise used. The chemical is a constituent in waste that was received in drums for storage and shipped off-site for final disposal with no other activity conducted at this site. |                                   |
| Methanol              | New Submission  | 2020                              |
| Reason for Response   | We did otherwise use more than 10,000 pounds of methanol in 2020.   |                                   |
| Naphthalene           | No Change   |                                   |
| Reason for Response   | This chemical was not manufactured, processed or otherwise used. The chemical is a constituent in waste that was received in drums for storage and shipped off-site for final disposal with no other activity conducted at this site. |                                   |
| Phenol                | No Change   |                                   |
| Reason for Response   | This chemical was not manufactured, processed or otherwise used. The chemical is a constituent in waste that was received in drums for storage and shipped off-site for final disposal with no other activity conducted at this site. |                                   |
| Toluene               | No Change   |                                   |
| Reason for Response   | This chemical was not manufactured, processed or otherwise used. The chemical is a constituent in waste that was received in drums for storage and shipped off-site for final disposal with no other activity conducted at this site. |                                   |

**PFAS-NOT-F RY 2020**

The source of these releases and quantities are listed below:

| Response            | Reporting Year<br>(if applicable)   |
|---------------------|---|
| No Change           |   |
| Reason for Response | This chemical was not manufactured, processed or otherwise used. The chemical is a constituent in waste that was received in drums for storage and shipped off-site for final disposal with no other activity conducted at this site. |

.....

## TM DEER PARK SERVICES LP (77536DSPSL2525B)

2525 BATTLEGROUND RD, DEER PARK, TX 77536 (Region 6)

### EPA Email – OG-1

Headquarters Email

07/29/2021 01:25pm

From: *Velu Senthil*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(TM DEER PARK SERVICES LP) (TRIFID: 77536DSPSL2525B)] Form R for Reporting Year(s) 2020 - Due September 10, 2021

| Sent To             | E-Mail Address            |
|---------------------|---------------------------|
| To: CHRISTINA PEREZ | CPEREZ@TEXASMOLECULAR.COM |
| To: CHRISTINA PEREZ | CPEREZ@TEXASMOLECULAR.COM |

Attachments:

#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

**Toxics Release Inventory (TRI) Data Quality Questions [(TM DEER PARK SERVICES LP) (TRIFID: 77536DSPSL2525B)] Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Thu Jul 29 17:25:08 EDT 2021

Dear CHRISTINA PEREZ:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Benzene, Cyanide compounds, Ethylbenzene, Formaldehyde, Hexafluoropropylene oxide dimer acid, Naphthalene and Xylene (mixed isomers) submitted to EPA from your facility: TM DEER PARK SERVICES LP) - (TRIFID: 77536DSPSL2525B) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Your facility reported 103,427 pounds of Total Land Release for Ethylbenzene in the current year. This was a decrease of 454,492 pounds from the previous year amount of 557,919 pounds.

- Your facility reported 1,026,227 pounds of Total Land Release for Cyanide compounds in the current year. This was a decrease of 1,209,563 pounds from the previous year amount of 2,235,790 pounds.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Hexafluoropropylene oxide dimer acid to TRI for reporting year 2020, but might have received Hexafluoropropylene oxide dimer acid in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Hexafluoropropylene oxide dimer acid for reporting year 2020, if required.
- Your facility reported 77,152 pounds of Total Land Release for Naphthalene in the current year. This was a decrease of 122,057 pounds from the previous year amount of 199,209 pounds.
- Your facility reported 2,209 pounds of Total Land Release for Xylene (mixed isomers) in the current year. This was a decrease of 474,201 pounds from the previous year amount of 476,410 pounds.
- Your facility reported 2,650,211 pounds of Total Treatment for Benzene in the current year 2020. This was an increase of 2,617,926 pounds from the previous year amount of 32,285 pounds. Check the quantities in Section 8.6 and 8.7 of the Form R.
- Your facility reported 269,938 pounds of Total Land Release for Formaldehyde in the current year. This was an increase of 220,905 pounds from the previous year amount of 49,033 pounds.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=15763b17-2d14-4d04-8147-68a74e7c2e26&target=bb0de9a0-3131-4782-8771-144774b09675>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by September 10, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Velu Senthil at [senthil.velu@epa.gov](mailto:senthil.velu@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Velu Senthil

## **EPA Email – OG-2**

Headquarters Email

08/19/2021 09:28am

From: *Velu Senthil*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(TM DEER PARK SERVICES LP) (TRIFID: 77536DSPSL2525B)] Form R for Reporting Year(s) 2020 - Due September 10, 2021

| Sent To             | E-Mail Address            |
|---------------------|---------------------------|
| To: CHRISTINA PEREZ | CPEREZ@TEXASMOLECULAR.COM |
| To: CHRISTINA PEREZ | CPEREZ@TEXASMOLECULAR.COM |

Attachments:

### **Questions for Your Facility [(TM DEER PARK SERVICES LP) (TRIFID: 77536DSPSL2525B)] Regarding Toxics Release Inventory (TRI) Submissions - Due September 10, 2021**

Dear CHRISTINA PEREZ:

This email is an reminder to EPA email(s) dated July 29, 2021 about data quality questions for your facility for reporting year(s) 2020. EPA has NOT received your web response yet. ***Please send your web response ASAP.***

#### **How do I respond to this inquiry?**

##### **Step 1:**

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=b902815b-4716-43d1-aa14-4eb09efcaafc&target=bb0de9a0-3131-4782-8771-144774b09675>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

##### **Step 2:**

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare

(<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by September 10, 2021.**

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Thank you for your attention to this matter.

Sincerely,

Velu Senthil

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

**Email sent on 07/29/2021 05:25pm**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

**Toxics Release Inventory (TRI) Data Quality Questions [(TM DEER PARK SERVICES LP) (TRIFID: 77536DSPSL2525B)] Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Thu Jul 29 17:25:08 EDT 2021

Dear CHRISTINA PEREZ:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Benzene, Cyanide compounds, Ethylbenzene, Formaldehyde, Hexafluoropropylene oxide dimer acid, Naphthalene and Xylene (mixed isomers) submitted to EPA from your facility: *TM DEER PARK SERVICES LP* - (TRIFID: 77536DSPSL2525B) for reporting year(s) 2020 has been identified for follow-up due to the following:**

## Reporting Year 2020

- Your facility reported 103,427 pounds of Total Land Release for Ethylbenzene in the current year. This was a decrease of 454,492 pounds from the previous year amount of 557,919 pounds.
- Your facility reported 1,026,227 pounds of Total Land Release for Cyanide compounds in the current year. This was a decrease of 1,209,563 pounds from the previous year amount of 2,235,790 pounds.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Hexafluoropropylene oxide dimer acid to TRI for reporting year 2020, but might have received Hexafluoropropylene oxide dimer acid in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Hexafluoropropylene oxide dimer acid for reporting year 2020, if required.
- Your facility reported 77,152 pounds of Total Land Release for Naphthalene in the current year. This was a decrease of 122,057 pounds from the previous year amount of 199,209 pounds.
- Your facility reported 2,209 pounds of Total Land Release for Xylene (mixed isomers) in the current year. This was a decrease of 474,201 pounds from the previous year amount of 476,410 pounds.
- Your facility reported 2,650,211 pounds of Total Treatment for Benzene in the current year 2020. This was an increase of 2,617,926 pounds from the previous year amount of 32,285 pounds. Check the quantities in Section 8.6 and 8.7 of the Form R.
- Your facility reported 269,938 pounds of Total Land Release for Formaldehyde in the current year. This was an increase of 220,905 pounds from the previous year amount of 49,033 pounds.

### ***How do I respond to this inquiry? (Step 1 is always required)***

#### *Step 1:*

Begin by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=15763b17-2d14-4d04-8147-68a74e7c2e26&target=bb0de9a0-3131-4782-8771-144774b09675>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

#### *Step 2:*

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by September 10, 2021.**

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If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Velu Senthil at [senthil.velu@epa.gov](mailto:senthil.velu@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Velu Senthil

### **EPA Email – OG-3**

Headquarters Email

09/02/2021 05:54am

From: *Velu Senthil*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(TM DEER PARK SERVICES LP) (TRIFID: 77536DSPSL2525B)] Form R for Reporting Year(s) 2020 - Due September 10, 2021

| Sent To             | E-Mail Address            |
|---------------------|---------------------------|
| To: CHRISTINA PEREZ | CPEREZ@TEXASMOLECULAR.COM |
| To: CHRISTINA PEREZ | CPEREZ@TEXASMOLECULAR.COM |

Attachments:

**Questions for Your Facility [(TM DEER PARK SERVICES LP) (TRIFID: 77536DSPSL2525B)] Regarding Toxics Release Inventory (TRI) Submissions - Due September 10, 2021**

Dear CHRISTINA PEREZ:

This email is an reminder to EPA email(s) dated August 19, 2021 and July 29, 2021 about data quality questions for your facility for reporting year(s) 2020. EPA has NOT received your web response yet. ***Please send your web response ASAP.***

#### **How do I respond to this inquiry?**

##### **Step 1:**

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=b8b12a61-2d1a-4350-91a7-704e3427acc9&target=bb0de9a0-3131-4782-8771-144774b09675>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

*Step 2:*

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If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by September 10, 2021.**

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Thank you for your attention to this matter.

Sincerely,

Velu Senthil

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

**Email sent on 08/19/2021 01:28pm**

**Questions for Your Facility [(TM DEER PARK SERVICES LP) (TRIFID: 77536DSPSL2525B)] Regarding Toxics Release Inventory (TRI) Submissions - Due September 10, 2021**

Dear CHRISTINA PEREZ:

This email is an reminder to EPA email(s) dated July 29, 2021 about data quality questions for your facility for reporting year(s) 2020. EPA has NOT received your web response yet. ***Please send your web response ASAP.***

**How do I respond to this inquiry?**

**Step 1:**

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=b902815b-4716-43d1-aa14-4eb09efcaafc&target=bb0de9a0-3131-4782-8771-144774b09675>

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Step 2:

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Thank you for your attention to this matter.

Sincerely,

Velu Senthil

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

**Email sent on 07/29/2021 05:25pm**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

**Toxics Release Inventory (TRI) Data Quality Questions [(TM DEER PARK SERVICES LP) (TRIFID: 77536DSPSL2525B)] Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Thu Jul 29 17:25:08 EDT 2021

Dear CHRISTINA PEREZ:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Benzene, Cyanide compounds, Ethylbenzene, Formaldehyde, Hexafluoropropylene oxide dimer acid, Naphthalene and Xylene (mixed isomers) submitted to EPA from your facility: *TM DEER PARK SERVICES LP* - (TRIFID: 77536DSPSL2525B) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Your facility reported 103,427 pounds of Total Land Release for Ethylbenzene in the current year. This was a decrease of 454,492 pounds from the previous year amount of 557,919 pounds.
- Your facility reported 1,026,227 pounds of Total Land Release for Cyanide compounds in the current year. This was a decrease of 1,209,563 pounds from the previous year amount of 2,235,790 pounds.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Hexafluoropropylene oxide dimer acid to TRI for reporting year 2020, but might have received Hexafluoropropylene oxide dimer acid in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Hexafluoropropylene oxide dimer acid for reporting year 2020, if required.
- Your facility reported 77,152 pounds of Total Land Release for Naphthalene in the current year. This was a decrease of 122,057 pounds from the previous year amount of 199,209 pounds.
- Your facility reported 2,209 pounds of Total Land Release for Xylene (mixed isomers) in the current year. This was a decrease of 474,201 pounds from the previous year amount of 476,410 pounds.
- Your facility reported 2,650,211 pounds of Total Treatment for Benzene in the current year 2020. This was an increase of 2,617,926 pounds from the previous year amount of 32,285 pounds. Check the quantities in Section 8.6 and 8.7 of the Form R.
- Your facility reported 269,938 pounds of Total Land Release for Formaldehyde in the current year. This was an increase of 220,905 pounds from the previous year amount of 49,033 pounds.

***How do I respond to this inquiry? (Step 1 is always required)***

*Step 1:*

Begin by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=15763b17-2d14-4d04-8147-68a74e7c2e26&target=bb0de9a0-3131-4782-8771-144774b09675>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

*Step 2:*

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If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by September 10, 2021.**

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Thank you for your attention to this matter.

Sincerely,

Velu Senthil

#### **EPA Email – OG-4**

Headquarters Email

09/02/2021 05:03pm

From: *Velu Senthil*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To             | E-Mail Address            |
|---------------------|---------------------------|
| To: CHRISTINA PEREZ | CPEREZ@TEXASMOLECULAR.COM |
| To: CHRISTINA PEREZ | CPEREZ@TEXASMOLECULAR.COM |

Attachments:

#### **UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

Thu Sep 02 21:03:07 EDT 2021

Dear CHRISTINA PEREZ:

EPA would like to inform you that data quality issues raised for your facility [TM DEER PARK SERVICES LP (TRIFID: 77536DSPSL2525B)] during reporting year 2020 Adhoc Data Quality Checks cycle are resolved for the following:

#### Reporting Year(s) Chemicals

2020 Benzene, Cyanide compounds, Ethylbenzene, Formaldehyde, Hexafluoropropylene oxide dimer acid, Naphthalene and Xylene (mixed isomers)

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Velu Senthil

TRI Data Quality Program

US EPA

**Email sent on 09/02/2021 06:37pm**

**From:** Senthil, Velu <Senthil.Velu@epa.gov>  
**Sent:** Thursday, August 19, 2021 2:00 PM  
**To:** Christina Perez <cperez@texasmolecular.com>  
**Cc:** Senthil, Velu <Senthil.Velu@epa.gov>  
**Subject:** RE: Toxics Release Inventory (TRI) Data Quality Questions [(TM DEER PARK SERVICES LP) (TRIFID: 77536DSPSL2525B)] Form R for Reporting Year(s) 2020 - Due September 10, 2021

Thanks for the update, Christina.

Velu Senthil

202-566-0749

**From:** Christina Perez <cperez@texasmolecular.com>  
**Sent:** Thursday, August 19, 2021 1:58 PM  
**To:** Senthil, Velu <Senthil.Velu@epa.gov>  
**Subject:** FW: Toxics Release Inventory (TRI) Data Quality Questions [(TM DEER PARK SERVICES LP) (TRIFID: 77536DSPSL2525B)] Form R for Reporting Year(s) 2020 - Due September 10, 2021

I'm still waiting for responses from some of our customers, I have not forgotten about this request. I just want to let you know that I am working on the questions below.

**Christina Perez**, Director - EHS

TM Deer Park Services LLC

2525 Independence Parkway South

P.O. Box 1914

Deer Park, TX 77536

281-930-2593 (office)

832-508-3666 (cell)

281-930-2798 (fax)

**From:** [senthil.velu@epa.gov](mailto:senthil.velu@epa.gov) <[senthil.velu@epa.gov](mailto:senthil.velu@epa.gov)>  
**Sent:** Thursday, August 19, 2021 12:39 PM  
**To:** Christina Perez <cperez@texasmolecular.com>  
**Subject:** Toxics Release Inventory (TRI) Data Quality Questions [(TM DEER PARK SERVICES LP) (TRIFID: 77536DSPSL2525B)] Form R for Reporting Year(s) 2020 - Due September 10, 2021

\*\*\*\* EXTERNAL EMAIL – Exercise caution, this email originated from outside of the company. DO NOT reply to, open attachments or click links if the email looks suspicious or is from an unknown sender. \*\*\*\*

**Questions for Your Facility [(TM DEER PARK SERVICES LP) (TRIFID: 77536DSPSL2525B)] Regarding Toxics Release Inventory (TRI) Submissions - Due September 10, 2021**

Dear CHRISTINA PEREZ:

This email is a reminder to EPA email(s) dated July 29, 2021 about data quality questions for your facility for reporting year(s) 2020. EPA has NOT received your web response yet. ***Please send your web response ASAP.***

**How do I respond to this inquiry?**

**Step 1:**

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<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=b902815b-4716-43d1-aa14-4eb09efcaafc&target=bb0de9a0-3131-4782-8771-144774b09675>

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<https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

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Thank you for your attention to this matter.

Sincerely,

Velu Senthil

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

**Email sent on 07/29/2021 05:25pm**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

**Toxics Release Inventory (TRI) Data Quality Questions [(TM DEER PARK SERVICES LP) (TRIFID: 77536DSPSL2525B)] Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Thu Jul 29 17:25:08 EDT 2021

Dear CHRISTINA PEREZ:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Benzene, Cyanide compounds, Ethylbenzene, Formaldehyde, Hexafluoropropylene oxide dimer acid, Naphthalene and Xylene (mixed isomers) submitted to EPA from your facility: TM DEER PARK SERVICES LP) - (TRIFID: 77536DSPSL2525B) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

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- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Hexafluoropropylene oxide dimer acid to TRI for reporting year 2020, but might have received Hexafluoropropylene oxide dimer acid in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Hexafluoropropylene oxide dimer acid for reporting year 2020, if required.
- Your facility reported 77,152 pounds of Total Land Release for Naphthalene in the current year. This was a decrease of 122,057 pounds from the previous year amount of 199,209 pounds.
- Your facility reported 2,209 pounds of Total Land Release for Xylene (mixed isomers) in the current year. This was a decrease of 474,201 pounds from the previous year amount of 476,410 pounds.
- Your facility reported 2,650,211 pounds of Total Treatment for Benzene in the current year 2020. This was an increase of 2,617,926 pounds from the previous year amount of 32,285 pounds. Check the quantities in Section 8.6 and 8.7 of the Form R.
- Your facility reported 269,938 pounds of Total Land Release for Formaldehyde in the current year. This was an increase of 220,905 pounds from the previous year amount of 49,033 pounds.

***How do I respond to this inquiry? (Step 1 is always required)***

*Step 1:*

Begin by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=15763b17-2d14-4d04-8147-68a74e7c2e26&target=bb0de9a0-3131-4782-8771-144774b09675>

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Thank you for your attention to this matter.

Sincerely,

Velu Senthil

TM DEER PARK SERVICES LP - 77536DSPSL2525B submitted a web response on Sep 2, 2021 6:37:15 PM. A PDF copy of the web response is attached.

### Facility Response – IC-1

Subject: Facility Response Form

Sep 2, 2021 6:37:15 PM

From: Christina Perez

(281) 930-2593

Cperez@texasmolecular.com

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

OPC-CNG-TMT RY 2020

- Your facility reported 2,650,211 pounds of Total Treatment for Benzene in the current year 2020. This was an increase of 2,617,926 pounds from the previous year amount of 32,285 pounds. Check the quantities in Section 8.6 and 8.7 of the Form R.

The source of these releases and quantities are listed below:

| Reported Chemical   | Response  | Reporting Year<br>(if applicable) |
|---------------------|---|-----------------------------------|
| Benzene             | Revision  | 2020                              |
| Reason for Response | In response to this inquiry, an audit of those streams containing this chemical was initiated. It was found that an error was made in which the unit of measurement was not converted properly during calculations of a particular waste stream. A revision has been submitted. |                                   |

PFAS-NOT RY 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Hexafluoropropylene oxide dimer acid to TRI for reporting year 2020, but might have received Hexafluoropropylene oxide dimer acid in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Hexafluoropropylene oxide dimer acid for reporting year 2020, if required.

The source of these releases and quantities are listed below:

| Reported Chemical                    | Response  | Reporting Year<br>(if applicable) |
|--------------------------------------|---|-----------------------------------|
| Hexafluoropropylene oxide dimer acid | Other   |                                   |
| Reason for Response                  | Our records indicate that this particular was reported to the agency on 7/1/2021. |                                   |

TSCA-CNG-REL RY 2020

- Your facility reported 1,026,227 pounds of Total Land Release for Cyanide compounds in the current year. This was a decrease of 1,209,563 pounds from the previous year amount of 2,235,790 pounds.
- Your facility reported 103,427 pounds of Total Land Release for Ethylbenzene in the current year. This was a decrease of 454,492 pounds from the previous year amount of 557,919 pounds.
- Your facility reported 2,209 pounds of Total Land Release for Xylene (mixed isomers) in the current year. This was a decrease of 474,201 pounds from the previous year amount of 476,410 pounds.
- Your facility reported 269,938 pounds of Total Land Release for Formaldehyde in the current year. This was an increase of 220,905 pounds from the previous year amount of 49,033 pounds.
- Your facility reported 77,152 pounds of Total Land Release for Naphthalene in the current year. This was a decrease of 122,057 pounds from the previous year amount of 199,209 pounds.

The source of these releases and quantities are listed below:

| Reported Chemical   | Response  | Reporting Year<br>(if applicable) |
|---------------------|---|-----------------------------------|
| Cyanide compounds   | No Change   |                                   |
| Reason for Response | This decrease was expected due to a decrease in waste receipts containing the chemical. |                                   |

| Reported Chemical      | Response   | Reporting Year<br>(if applicable) |
|------------------------|--|-----------------------------------|
| Ethylbenzene           | No Change  |                                   |
| Reason for Response    | This decrease was expected due to a particular waste stream that stopped shipping between 2019 and 2020. |                                   |
| Formaldehyde           | Revision   | 2020                              |
| Reason for Response    | The original submittal had a typographic error. A revision has been submitted to correct this.           |                                   |
| Naphthalene            | Revision   | 2020                              |
| Reason for Response    |  |                                   |
| Xylene (mixed isomers) |  |                                   |
| Reason for Response    |  |                                   |

.....

**S R BERTRON ELECTRIC GENERATING  
STATION (77536SRBRT2018M)  
2018 MILLER CUTOFF RD, LA PORTE, TX 77536 (Region 6)**

**EPA Email – OG-1**

Region 6 Email

03/07/2022 05:47am

From: *Morton Wakeland*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(S R BERTRON ELECTRIC GENERATING STATION) (TRIFID: 77536SRBRT2018M)] for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To               | E-Mail Address          |
|-----------------------|-------------------------|
| Self: Morton Wakeland | wakeland.morton@epa.gov |
| To: RICK ANDERSON     | RLANDERSON@TXGENCO.COM  |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1201 Elm Street Suite 500 DALLAS, TX 75270-2102

**Toxics Release Inventory (TRI) Data Quality Questions [(S R BERTRON ELECTRIC GENERATING STATION) (TRIFID: 77536SRBRT2018M)] for Reporting Year(s) 2020 - Due April 29, 2022**

Mon Mar 07 10:47:11 EST 2022

Dear RICK ANDERSON:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The for NO\_VALUE submitted to EPA from your facility: S R BERTRON ELECTRIC GENERATING STATION) - (TRIFID: 77536SRBRT2018M) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 1 hazardous waste shipments (some e-Manifest #: 1) totaling 15,010 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=b5c5344b-8f40-4535-937f-ffe9de98f384&target=a34d53c3-2cda-4e4a-9ad1-c528203051b5>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Morton Wakeland at [wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Morton Wakeland

**EQUISTAR CHEMICALS LP (77571QNTMC1515M)  
1515 MILLER CUT OFF RD, LA PORTE, TX 77571 (Region 6)**

**EPA Email – OG-1**

Region 6 Email

03/07/2022 05:28am

From: *Morton Wakeland*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(EQUISTAR CHEMICALS LP) (TRIFID: 77571QNTMC1515M)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To               | E-Mail Address                       |
|-----------------------|--------------------------------------|
| Self: Morton Wakeland | wakeland.morton@epa.gov              |
| To: MEREDITH MATTHEWS | MEREDITH.MATTHEWS@LYONDELLBASELL.COM |
| To: KEITH ZUCHA       | C.ZUCHA@LYB.COM                      |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1201 Elm Street Suite 500 DALLAS, TX 75270-2102

**Toxics Release Inventory (TRI) Data Quality Questions [(EQUISTAR CHEMICALS LP) (TRIFID: 77571QNTMC1515M)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Mon Mar 07 10:28:39 EST 2022

Dear KEITH ZUCHA and MEREDITH MATTHEWS:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: EQUISTAR CHEMICALS LP) - (TRIFID: 77571QNTMC1515M) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 3 hazardous waste shipments (some e-Manifest #: 3) totaling 33,134 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=5141d66c-8562-461b-be43-90aad25f29c2&target=a442448f-4566-4eea-aa6f-248b520d9a0d>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Morton Wakeland at [wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Morton Wakeland

## EPA Email – OG-2

**From:** Wakeland, Morton <wakeland.morton@epa.gov>  
**Sent:** Thursday, March 24, 2022 5:00 PM  
**To:** Cobb, Chelsey R <Chelsey.Cobb@lyondellbasell.com>  
**Cc:** Zucha, C Keith <C.Zucha@lyondellbasell.com>; Freed, Christopher L <Christopher.Freed@lyondellbasell.com>  
**Subject:** RE: EQUISTAR CHEMICALS LP) - (TRIFID: 77571QNTMC1515M) and LYONDELLBASELL ACETYLIS LLC) - (TRIFID: 77571QNTMC11603)  
**Importance:** High

No Mr. here, Mort will do just fine!

I don't have the manifest. The question was generated at HQ's from an eManifest search the TRI Program did.

I simply sent out the questions for the 2 sites.

I ran a report in Envirofacts – TRI Offsite Transfers – attaching my spreadsheets for both sites. **Look at the red tab**

However, you need to check both sites TRI records to see if something was missed.

The sites should have copies of the eManifest for 2020. This may be a regulatory requirement under RCRA?

Thanks for your prompt attention to this matter.

Mort

The Form R for NO\_VALUE submitted to EPA from your facility: **EQUISTAR CHEMICALS LP) - (TRIFID: 77571QNTMC1515M)** for reporting year(s) 2020 has been identified for follow-up due to the following:

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfes\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfes_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 3 hazardous waste shipments (some e-Manifest #: 3) totaling 33,134 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

For Equistar – I show no PFAS chemicals being sent offsite – all zero's for a PFAS Identifier

However, your facility should have copies of the eManifest for 2020.

| H             | I    | J                             | K                  | L    | M                                    | N                    | O             | P              |
|---------------|------|-------------------------------|--------------------|------|--------------------------------------|----------------------|---------------|----------------|
| FRS ID-SENDER | RY   | OFFSITE CHEMICAL NAME         | POUNDS TRANSFERRED | PFAS | SENT TO OFFSITE NAME-RECEIVER        | ADDRESS-RECEIVER     | CITY-RECEIVER | STATE-RECEIVER |
| 110034641635  | 2020 | Benzene                       | 7.7                | 0    | TM DEER PARK SERVICES                | 2525 INDEPENDENCE RD | DEER PARK     | TX             |
| 110034641635  | 2020 | Benzene                       | 18.0               | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Benzene                       | 0.0                | 0    | ALLIED WASTE - MCCARTY ROAD          | 5757 A OATES RD      | HOUSTON       | TX             |
| 110034641635  | 2020 | Benzene                       | 43,000.0           | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Benzene                       | 230.0              | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Benzene                       | 0.0                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Benzene                       | 150.0              | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Ethylbenzene                  | 6,200.0            | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Ethylbenzene                  | 0.1                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Hydroquinone                  | 85.0               | 0    | ECO SERVICES OPERATIONS HOUSTON      | 8615 MANCHESTER ST   | HOUSTON       | TX             |
| 110034641635  | 2020 | Mercury And Mercury Compounds | 0.6                | 0    | GULF WEST LANDFILL TEXAS             | 2601 JENKINS RD      | ANAHUAC       | TX             |
| 110034641635  | 2020 | Mercury And Mercury Compounds | 0.0                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Mercury And Mercury Compounds | 0.0                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Mercury And Mercury Compounds | 0.1                | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Methanol                      | 5,200.0            | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Naphthalene                   | 3,300.0            | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Naphthalene                   | 2.0                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Naphthalene                   | 0.1                | 0    | TM DEER PARK SERVICES                | 2525 INDEPENDENCE RD | DEER PARK     | TX             |
| 110034641635  | 2020 | Styrene                       | 0.0                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Styrene                       | 28.0               | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Styrene                       | 5.0                | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Styrene                       | 29,000.0           | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Styrene                       | 0.2                | 0    | TM DEER PARK SERVICES                | 2525 INDEPENDENCE RD | DEER PARK     | TX             |
| 110034641635  | 2020 | Toluene                       | 29,000.0           | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Toluene                       | 3.0                | 0    | TM DEER PARK SERVICES                | 2525 INDEPENDENCE RD | DEER PARK     | TX             |
| 110034641635  | 2020 | Toluene                       | 0.1                | 0    | GULF WEST LANDFILL TEXAS             | 2601 JENKINS RD      | ANAHUAC       | TX             |
| 110034641635  | 2020 | Toluene                       | 20.0               | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Toluene                       | 590.0              | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Toluene                       | 0.0                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Toluene                       | 24.0               | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Toluene                       | 0.5                | 0    | TM DEER PARK SERVICES                | 2525 INDEPENDENCE RD | DEER PARK     | TX             |
| 110034641635  | 2020 | Vinyl acetate                 | 2,700,000.0        | 0    | ECO SERVICES OPERATIONS HOUSTON      | 8615 MANCHESTER ST   | HOUSTON       | TX             |
| 110034641635  | 2020 | Vinyl acetate                 | 650,000.0          | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
|               |      |                               |                    |      |                                      |                      |               |                |
|               |      |                               |                    |      |                                      |                      |               |                |
|               |      |                               |                    |      |                                      |                      |               |                |

The Form R for Chromium compounds (except for chromite ore mined in the Transvaal Region) submitted to EPA from your facility: **LYONDELLBASELL ACETYLIS LLC** - (TRIFID: **77571QNTMC11603**) for reporting year(s) 2020 has been identified for follow-up due to the following:

#### Reporting Year 2020

- It appears your facility has sent approximately 18) shipments (sub eManifest IDs) totaling 595,540 pounds of hazardous waste listed containing Chromium / Chromium compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Chromium / Chromium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Chromium / Chromium compounds for reporting year 2020, if needed.

Likewise for LyondellBasell – I show no Chromium/Chromium Compounds sent offsite.

Again, the facility should have copies of the eManifest.

| H             | I    | J                             | K                  | L    | M                                    | N                    | O             | P              |
|---------------|------|-------------------------------|--------------------|------|--------------------------------------|----------------------|---------------|----------------|
| FRS_ID-SENDER | RY   | OFFSITE_CHEMICAL_NAME         | POUNDS_TRANSFERRED | PFAS | SENT_TO_OFFSITE_NAME-RECEIVER        | ADDRESS-RECEIVER     | CITY-RECEIVER | STATE-RECEIVER |
| 110034641635  | 2020 | Benzene                       | 7.7                | 0    | TM DEER PARK SERVICES                | 2525 INDEPENDENCE RD | DEER PARK     | TX             |
| 110034641635  | 2020 | Benzene                       | 18.0               | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Benzene                       | 0.0                | 0    | ALLIED WASTE - MCCARTY ROAD          | 5757 A OATES RD      | HOUSTON       | TX             |
| 110034641635  | 2020 | Benzene                       | 43,000.0           | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Benzene                       | 230.0              | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Benzene                       | 0.0                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Benzene                       | 150.0              | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Ethylbenzene                  | 6,200.0            | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Ethylbenzene                  | 0.1                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
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| 110034641635  | 2020 | Mercury And Mercury Compounds | 0.6                | 0    | GULF WEST LANDFILL TEXAS             | 2601 JENKINS RD      | ANAHUAC       | TX             |
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| 110034641635  | 2020 | Mercury And Mercury Compounds | 0.0                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Mercury And Mercury Compounds | 0.1                | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Methanol                      | 5,200.0            | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Naphthalene                   | 3,300.0            | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Naphthalene                   | 2.0                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Naphthalene                   | 0.1                | 0    | TM DEER PARK SERVICES                | 2525 INDEPENDENCE RD | DEER PARK     | TX             |
| 110034641635  | 2020 | Styrene                       | 0.0                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Styrene                       | 28.0               | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Styrene                       | 5.0                | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Styrene                       | 29,000.0           | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Styrene                       | 0.2                | 0    | TM DEER PARK SERVICES                | 2525 INDEPENDENCE RD | DEER PARK     | TX             |
| 110034641635  | 2020 | Toluene                       | 29,000.0           | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Toluene                       | 3.0                | 0    | TM DEER PARK SERVICES                | 2525 INDEPENDENCE RD | DEER PARK     | TX             |
| 110034641635  | 2020 | Toluene                       | 0.1                | 0    | GULF WEST LANDFILL TEXAS             | 2601 JENKINS RD      | ANAHUAC       | TX             |
| 110034641635  | 2020 | Toluene                       | 20.0               | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Toluene                       | 590.0              | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
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| 110034641635  | 2020 | Toluene                       | 24.0               | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
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| 110034641635  | 2020 | Vinyl acetate                 | 2,700,000.0        | 0    | ECO SERVICES OPERATIONS HOUSTON      | 8615 MANCHESTER ST   | HOUSTON       | TX             |
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|               |      |                               |                    |      |                                      |                      |               |                |
|               |      |                               |                    |      |                                      |                      |               |                |
|               |      |                               |                    |      |                                      |                      |               |                |



Morton E. Wakeland, Jr. ("Mort"), Ph.D.

## EPCRA Section 313 Enforcement and TRI

Program Coordinator

U.S. EPA Region 6

Compliance Assurance and Enforcement

Division (ECD)

Waste Enforcement Branch (ECDS)

Toxics Section (ECDST)

Dallas, Texas 75270

(214) 665-8116

## Facility Response – IC-1

**From:** Cobb, Chelsey R <[Chelsey.Cobb@lyondellbasell.com](mailto:Chelsey.Cobb@lyondellbasell.com)>

**Sent:** Thursday, March 24, 2022 8:19 AM

**To:** Wakeland, Morton <[wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov)>

**Cc:** Zucha, C Keith <[C.Zucha@lyondellbasell.com](mailto:C.Zucha@lyondellbasell.com)>; Freed, Christopher L

<[Christopher.Freed@lyondellbasell.com](mailto:Christopher.Freed@lyondellbasell.com)>

**Subject:** EQUISTAR CHEMICALS LP) - (TRIFID: 77571QNTMC1515M) and LYONDELLBASELL ACETYLS LLC) - (TRIFID: 77571QNTMC11603)

Good morning, Mr. Wakeland,

I am following up on an email inquiry for TRI reporting year 2020 for the below facilities.

***EQUISTAR CHEMICALS LP) - (TRIFID: 77571QNTMC1515M)***

***LYONDELLBASELL ACETYLS LLC) - (TRIFID: 77571QNTMC11603)***

The facility had recently acquired a couple new units and were going through a transition of name changing and reporting accounts approximately around this time, so it would be helpful to identify exactly which manifests you are referring to. We are not aware of shipping this material occurring in 2020. Could you please send us the manifest numbers referenced below so that we can review and determine if this information is correct?

**The Form R for NO\_VALUE submitted to EPA from your facility: *EQUISTAR CHEMICALS LP) - (TRIFID: 77571QNTMC1515M)* for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 3 hazardous waste shipments (some e-Manifest #s: 3) totaling 33,134 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

**The Form R for Chromium compounds (except for chromite ore mined in the Transvaal Region) submitted to EPA from your facility: *LYONDELLBASELL ACETYLS LLC) - (TRIFID: 77571QNTMC11603)* for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- It appears your facility has sent approximately 18) shipments (sub eManifest IDs) totaling 595,540 pounds of hazardous waste listed containing Chromium / Chromium compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Chromium / Chromium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Chromium / Chromium compounds for reporting year 2020, if needed.

Please let me know if we could have a conference call to discuss further for any clarification needed.

Thank you,

**Chelsey Cobb**

Environmental Engineer

LyondellBasell La Porte Complex

[Chelsey.Cobb@lyondellbasell.com](mailto:Chelsey.Cobb@lyondellbasell.com)

O: 713-209-1672; C: 580-716-3919



### EPA Email – OG-3

**From:** Senthil, Velu <[Senthil.Velu@epa.gov](mailto:Senthil.Velu@epa.gov)>

**Sent:** Thursday, March 24, 2022 5:45 PM

**To:** Wakeland, Morton <[wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov)>; Cobb, Chelsey R <[Chelsey.Cobb@lyondellbasell.com](mailto:Chelsey.Cobb@lyondellbasell.com)>

**Cc:** Zucha, C Keith <[C.Zucha@lyondellbasell.com](mailto:C.Zucha@lyondellbasell.com)>; Freed, Christopher L <[Christopher.Freed@lyondellbasell.com](mailto:Christopher.Freed@lyondellbasell.com)>;

Senthil, Velu <[Senthil.Velu@epa.gov](mailto:Senthil.Velu@epa.gov)>

**Subject:** RE: EQUISTAR CHEMICALS LP) - (TRIFID: 77571QNTMC1515M) and LYONDELLBASELL ACETYLS LLC) - (TRIFID: 77571QNTMC11603)

Please see attached some of your facility's eManifests that listed containing chromium....

I will try to send eManifests for PFAS soon....

Thanks

Velu Senthil

*(Pronoun: he, his)*

US EPA

202-566-0749

### EPA Email – OG-4

**From:** Wakeland, Morton <[wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov)>

**Sent:** Thursday, March 24, 2022 5:00 PM

**To:** Cobb, Chelsey R <[Chelsey.Cobb@lyondellbasell.com](mailto:Chelsey.Cobb@lyondellbasell.com)>

**Cc:** Zucha, C Keith <[C.Zucha@lyondellbasell.com](mailto:C.Zucha@lyondellbasell.com)>; Freed, Christopher L <[Christopher.Freed@lyondellbasell.com](mailto:Christopher.Freed@lyondellbasell.com)>

**Subject:** RE: EQUISTAR CHEMICALS LP) - (TRIFID: 77571QNTMC1515M) and LYONDELLBASELL ACETYLS LLC) - (TRIFID: 77571QNTMC11603)

**Importance:** High

No Mr. here, Mort will do just fine!

I don't have the manifest. The question was generated at HQ's from an eManifest search the TRI Program did.

| H             | I    | J                             | K                  | L       | M                                  | N                                  | O                    | P              |
|---------------|------|-------------------------------|--------------------|---------|------------------------------------|------------------------------------|----------------------|----------------|
| FRS_ID-SENDER | RY   | OFFSITE_CHEMICAL_NAME         | POUNDS_TRANSFERRED | PFAS    | SENT_TO_OFFSITE_NAME-RECEIVER      | ADDRESS-RECEIVER                   | CITY-RECEIVER        | STATE-RECEIVER |
| 110034641635  | 2020 | Benzene                       |                    | 7.7     | 0                                  | TM DEER PARK SERVICES              | 2525 INDEPENDENCE RD | DEER PARK TX   |
| 110034641635  | 2020 | Benzene                       |                    | 18.0    | 0                                  | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD    | HOUSTON TX     |
| 110034641635  | 2020 | Benzene                       |                    | 0.0     | 0                                  | ALLIED WASTE - MCCARTY ROAD        | 5757 A OATES RD      | HOUSTON TX     |
| 110034641635  | 2020 | Benzene                       | 43,000.0           | 0       | CHEMICAL RECLAMATION SERVICES AVAL | 405 POWELL ST                      | AVALLON TX           |                |
| 110034641635  | 2020 | Benzene                       | 230.0              | 0       | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD                  | HOUSTON TX           |                |
| 110034641635  | 2020 | Benzene                       |                    | 0.0     | 0                                  | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD    | HOUSTON TX     |
| 110034641635  | 2020 | Benzene                       | 150.0              | 0       | CHEMICAL RECLAMATION SERVICES AVAL | 405 POWELL ST                      | AVALLON TX           |                |
| 110034641635  | 2020 | Ethylbenzene                  | 6,200.0            | 0       | CHEMICAL RECLAMATION SERVICES AVAL | 405 POWELL ST                      | AVALLON TX           |                |
| 110034641635  | 2020 | Ethylbenzene                  |                    | 0.1     | 0                                  | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD    | HOUSTON TX     |
| 110034641635  | 2020 | Hydroquinone                  |                    | 85.0    | 0                                  | ECO SERVICES OPERATIONS HOUSTON    | 8615 MANCHESTER ST   | HOUSTON TX     |
| 110034641635  | 2020 | Mercury And Mercury Compounds |                    | 0.6     | 0                                  | GULF WEST LANDFILL TEXAS           | 2601 JENKINS RD      | ANAHUAC TX     |
| 110034641635  | 2020 | Mercury And Mercury Compounds |                    | 0.0     | 0                                  | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD    | HOUSTON TX     |
| 110034641635  | 2020 | Mercury And Mercury Compounds |                    | 0.0     | 0                                  | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD    | HOUSTON TX     |
| 110034641635  | 2020 | Mercury And Mercury Compounds |                    | 0.1     | 0                                  | CHEMICAL RECLAMATION SERVICES AVAL | 405 POWELL ST        | AVALLON TX     |
| 110034641635  | 2020 | Methanol                      |                    | 5,200.0 | 0                                  | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD    | HOUSTON TX     |
| 110034641635  | 2020 | Naphthalene                   |                    | 3,300.0 | 0                                  | CHEMICAL RECLAMATION SERVICES AVAL | 405 POWELL ST        | AVALLON TX     |
| 110034641635  | 2020 | Naphthalene                   |                    | 2.0     | 0                                  | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD    | HOUSTON TX     |
| 110034641635  | 2020 | Naphthalene                   |                    | 0.1     | 0                                  | TM DEER PARK SERVICES              | 2525 INDEPENDENCE RD | DEER PARK TX   |
| 110034641635  | 2020 | Styrene                       |                    | 0.0     | 0                                  | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD    | HOUSTON TX     |
| 110034641635  | 2020 | Styrene                       |                    | 28.0    | 0                                  | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD    | HOUSTON TX     |
| 110034641635  | 2020 | Styrene                       |                    | 5.0     | 0                                  | CHEMICAL RECLAMATION SERVICES AVAL | 405 POWELL ST        | AVALLON TX     |
| 110034641635  | 2020 | Styrene                       | 29,000.0           | 0       | CHEMICAL RECLAMATION SERVICES AVAL | 405 POWELL ST                      | AVALLON TX           |                |
| 110034641635  | 2020 | Styrene                       |                    | 0.2     | 0                                  | TM DEER PARK SERVICES              | 2525 INDEPENDENCE RD | DEER PARK TX   |
| 110034641635  | 2020 | Toluene                       | 29,000.0           | 0       | CHEMICAL RECLAMATION SERVICES AVAL | 405 POWELL ST                      | AVALLON TX           |                |
| 110034641635  | 2020 | Toluene                       |                    | 3.0     | 0                                  | TM DEER PARK SERVICES              | 2525 INDEPENDENCE RD | DEER PARK TX   |
| 110034641635  | 2020 | Toluene                       |                    | 0.1     | 0                                  | GULF WEST LANDFILL TEXAS           | 2601 JENKINS RD      | ANAHUAC TX     |
| 110034641635  | 2020 | Toluene                       |                    | 20.0    | 0                                  | CHEMICAL RECLAMATION SERVICES AVAL | 405 POWELL ST        | AVALLON TX     |
| 110034641635  | 2020 | Toluene                       |                    | 590.0   | 0                                  | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD    | HOUSTON TX     |
| 110034641635  | 2020 | Toluene                       |                    | 0.0     | 0                                  | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD    | HOUSTON TX     |
| 110034641635  | 2020 | Toluene                       |                    | 24.0    | 0                                  | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD    | HOUSTON TX     |
| 110034641635  | 2020 | Toluene                       |                    | 0.5     | 0                                  | TM DEER PARK SERVICES              | 2525 INDEPENDENCE RD | DEER PARK TX   |
| 110034641635  | 2020 | Vinyl acetate                 | 2,700,000.0        | 0       | ECO SERVICES OPERATIONS HOUSTON    | 8615 MANCHESTER ST                 | HOUSTON TX           |                |
| 110034641635  | 2020 | Vinyl acetate                 | 650,000.0          | 0       | CHEMICAL RECLAMATION SERVICES AVAL | 405 POWELL ST                      | AVALLON TX           |                |

The Form R for Chromium compounds (except for chromite ore mined in the Transvaal Region) submitted to EPA from your facility: **LYONDELLBASELL ACETYLIS LLC** - (TRIFID: **77571QNTMC11603**) for reporting year(s) 2020 has been identified for follow-up due to the following:

Reporting Year 2020

- It appears your facility has sent approximately 18) shipments (sub eManifest IDs) totaling 595,540 pounds of hazardous waste listed containing Chromium / Chromium compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Chromium / Chromium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Chromium / Chromium compounds for reporting year 2020, if needed.

Likewise for LyondellBasell – I show no Chromium/Chromium Compounds sent offsite.

Again, the facility should have copies of the eManifest.

| H             | I    | J                             | K                  | L    | M                                    | N                    | O             | P              |
|---------------|------|-------------------------------|--------------------|------|--------------------------------------|----------------------|---------------|----------------|
| FRS ID-SENDER | RY   | OFFSITE CHEMICAL NAME         | POUNDS TRANSFERRED | PFAS | SENT TO OFFSITE NAME-RECEIVER        | ADDRESS-RECEIVER     | CITY-RECEIVER | STATE-RECEIVER |
| 110034641635  | 2020 | Benzene                       | 7.7                | 0    | TM DEER PARK SERVICES                | 2525 INDEPENDENCE RD | DEER PARK     | TX             |
| 110034641635  | 2020 | Benzene                       | 18.0               | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Benzene                       | 0.0                | 0    | ALLIED WASTE - MCCARTY ROAD          | 5757 A OATES RD      | HOUSTON       | TX             |
| 110034641635  | 2020 | Benzene                       | 43,000.0           | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Benzene                       | 230.0              | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Benzene                       | 0.0                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Benzene                       | 150.0              | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Ethylbenzene                  | 6,200.0            | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Ethylbenzene                  | 0.1                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Hydroquinone                  | 85.0               | 0    | ECO SERVICES OPERATIONS HOUSTON      | 8615 MANCHESTER ST   | HOUSTON       | TX             |
| 110034641635  | 2020 | Mercury And Mercury Compounds | 0.6                | 0    | GULF WEST LANDFILL TEXAS             | 2601 JENKINS RD      | ANAHUAC       | TX             |
| 110034641635  | 2020 | Mercury And Mercury Compounds | 0.0                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Mercury And Mercury Compounds | 0.0                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Mercury And Mercury Compounds | 0.1                | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Methanol                      | 5,200.0            | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Naphthalene                   | 3,300.0            | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Naphthalene                   | 2.0                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Naphthalene                   | 0.1                | 0    | TM DEER PARK SERVICES                | 2525 INDEPENDENCE RD | DEER PARK     | TX             |
| 110034641635  | 2020 | Styrene                       | 0.0                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Styrene                       | 28.0               | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Styrene                       | 5.0                | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Styrene                       | 29,000.0           | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Styrene                       | 0.2                | 0    | TM DEER PARK SERVICES                | 2525 INDEPENDENCE RD | DEER PARK     | TX             |
| 110034641635  | 2020 | Toluene                       | 29,000.0           | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Toluene                       | 3.0                | 0    | TM DEER PARK SERVICES                | 2525 INDEPENDENCE RD | DEER PARK     | TX             |
| 110034641635  | 2020 | Toluene                       | 0.1                | 0    | GULF WEST LANDFILL TEXAS             | 2601 JENKINS RD      | ANAHUAC       | TX             |
| 110034641635  | 2020 | Toluene                       | 20.0               | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Toluene                       | 590.0              | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Toluene                       | 0.0                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Toluene                       | 24.0               | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Toluene                       | 0.5                | 0    | TM DEER PARK SERVICES                | 2525 INDEPENDENCE RD | DEER PARK     | TX             |
| 110034641635  | 2020 | Vinyl acetate                 | 2,700,000.0        | 0    | ECO SERVICES OPERATIONS HOUSTON      | 8615 MANCHESTER ST   | HOUSTON       | TX             |
| 110034641635  | 2020 | Vinyl acetate                 | 650,000.0          | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |



Morton E. Wakeland, Jr. ("Mort"), Ph.D.

EPCRA Section 313 Enforcement and TRI

Program Coordinator

U.S. EPA Region 6

Compliance Assurance and Enforcement

Division (ECD)

Waste Enforcement Branch (ECDS)

Toxics Section (ECDST)

Dallas, Texas 75270

(214) 665-8116

**From:** Cobb, Chelsey R <[Chelsey.Cobb@lyondellbasell.com](mailto:Chelsey.Cobb@lyondellbasell.com)>

**Sent:** Thursday, March 24, 2022 8:19 AM

**To:** Wakeland, Morton <[wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov)>

**Cc:** Zucha, C Keith <[C.Zucha@lyondellbasell.com](mailto:C.Zucha@lyondellbasell.com)>; Freed, Christopher L <[Christopher.Freed@lyondellbasell.com](mailto:Christopher.Freed@lyondellbasell.com)>

**Subject:** EQUISTAR CHEMICALS LP) - (TRIFID: 77571QNTMC1515M) and LYONDELLBASELL ACETYLS LLC) - (TRIFID: 77571QNTMC11603)

Good morning, Mr. Wakeland,

I am following up on an email inquiry for TRI reporting year 2020 for the below facilities.

***EQUISTAR CHEMICALS LP) - (TRIFID: 77571QNTMC1515M)***

***LYONDELLBASELL ACETYLS LLC) - (TRIFID: 77571QNTMC11603)***

The facility had recently acquired a couple new units and were going through a transition of name changing and reporting accounts approximately around this time, so it would be helpful to identify exactly which manifests you are referring to. We are not aware of shipping this material occurring in 2020. Could you please send us the manifest numbers referenced below so that we can review and determine if this information is correct?

**The Form R for NO\_VALUE submitted to EPA from your facility: *EQUISTAR CHEMICALS LP) - (TRIFID: 77571QNTMC1515M)* for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 3 hazardous waste shipments (some e-Manifest #: 3) totaling 33,134 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

**The Form R for Chromium compounds (except for chromite ore mined in the Transvaal Region) submitted to EPA from your facility: *LYONDELLBASELL ACETYLS LLC) - (TRIFID: 77571QNTMC11603)* for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- It appears your facility has sent approximately 18) shipments (sub eManifest IDs) totaling 595,540 pounds of hazardous waste listed containing Chromium / Chromium compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Chromium / Chromium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Chromium / Chromium compounds for reporting year 2020, if needed.

Please let me know if we could have a conference call to discuss further for any clarification needed.

Thank you,

**Chelsey Cobb**

Environmental Engineer

LyondellBasell La Porte Complex

[Chelsey.Cobb@lyondellbasell.com](mailto:Chelsey.Cobb@lyondellbasell.com)

O: 713-209-1672; C: 580-716-3919



## EPA Email – OG-5

**From:** Senthil, Velu <[Senthil.Velu@epa.gov](mailto:Senthil.Velu@epa.gov)>

**Sent:** Thursday, March 24, 2022 5:56 PM

**To:** Wakeland, Morton <[wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov)>; Cobb, Chelsey R <[Chelsey.Cobb@lyondellbasell.com](mailto:Chelsey.Cobb@lyondellbasell.com)>

**Cc:** Zucha, C Keith <[C.Zucha@lyondellbasell.com](mailto:C.Zucha@lyondellbasell.com)>; Freed, Christopher L <[Christopher.Freed@lyondellbasell.com](mailto:Christopher.Freed@lyondellbasell.com)>; Senthil, Velu <[Senthil.Velu@epa.gov](mailto:Senthil.Velu@epa.gov)>

**Subject:** RE: EQUISTAR CHEMICALS LP) - (TRIFID: 77571QNTMC1515M) and LYONDELLBASELL ACETYLS LLC) - (TRIFID: 77571QNTMC11603)

Here are emanifests for PFAS.....

Thanks

Velu Senthil

*(Pronoun: he, his)*

US EPA

202-566-0749

**From:** Senthil, Velu <[Senthil.Velu@epa.gov](mailto:Senthil.Velu@epa.gov)>

**Sent:** Thursday, March 24, 2022 5:45 PM

**To:** Wakeland, Morton <[wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov)>; Cobb, Chelsey R <[Chelsey.Cobb@lyondellbasell.com](mailto:Chelsey.Cobb@lyondellbasell.com)>

**Cc:** Zucha, C Keith <[C.Zucha@lyondellbasell.com](mailto:C.Zucha@lyondellbasell.com)>; Freed, Christopher L <[Christopher.Freed@lyondellbasell.com](mailto:Christopher.Freed@lyondellbasell.com)>;

Senthil, Velu <[Senthil.Velu@epa.gov](mailto:Senthil.Velu@epa.gov)>

**Subject:** RE: EQUISTAR CHEMICALS LP) - (TRIFID: 77571QNTMC1515M) and LYONDELLBASELL ACETYLS LLC) - (TRIFID: 77571QNTMC11603)

Please see attached some of your facility's eManifests that listed containing chromium....

I will try to send eManifests for PFAS soon....

Thanks

Velu Senthil

(Pronoun: he, his)

US EPA

202-566-0749

**From:** Wakeland, Morton <[wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov)>

**Sent:** Thursday, March 24, 2022 5:00 PM

**To:** Cobb, Chelsey R <[Chelsey.Cobb@lyondellbasell.com](mailto:Chelsey.Cobb@lyondellbasell.com)>

**Cc:** Zucha, C Keith <[C.Zucha@lyondellbasell.com](mailto:C.Zucha@lyondellbasell.com)>; Freed, Christopher L <[Christopher.Freed@lyondellbasell.com](mailto:Christopher.Freed@lyondellbasell.com)>

**Subject:** RE: EQUISTAR CHEMICALS LP) - (TRIFID: 77571QNTMC1515M) and LYONDELLBASELL ACETYLS LLC) - (TRIFID: 77571QNTMC11603)

**Importance:** High

No Mr. here, Mort will do just fine!

I don't have the manifest. The question was generated at HQ's from an eManifest search the TRI Program did.

I simply sent out the questions for the 2 sites.

I ran a report in Envirofacts – TRI Offsite Transfers – attaching my spreadsheets for both sites. **Look at the red tab**

However, you need to check both sites TRI records to see if something was missed.

The sites should have copies of the eManifest for 2020. This may be a regulatory requirement under RCRA?

Thanks for your prompt attention to this matter.

Mort

The Form R for NO\_VALUE submitted to EPA from your facility: **EQUISTAR CHEMICALS LP) - (TRIFID: 77571QNTMC1515M)** for reporting year(s) 2020 has been identified for follow-up due to the following:

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 3 hazardous waste shipments (some e-Manifest #s: 3) totaling 33,134 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

However, your facility should have copies of the eManifest for 2020.

| H             | I    | J                             | K                  | L           | M                             | N                                  | O                    | P              |
|---------------|------|-------------------------------|--------------------|-------------|-------------------------------|------------------------------------|----------------------|----------------|
| FRS_ID-SENDER | RY   | OFFSITE_CHEMICAL_NAME         | POUNDS_TRANSFERRED | PFAS        | SENT_TO-OFFSITE_NAME-RECEIVER | ADDRESS-RECEIVER                   | CITY-RECEIVER        | STATE-RECEIVER |
| 110034641635  | 2020 | Benzene                       |                    | 7.7         | 0                             | TM DEER PARK SERVICES              | 2525 INDEPENDENCE RD | DEER PARK TX   |
| 110034641635  | 2020 | Benzene                       |                    | 18.0        | 0                             | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD    | HOUSTON TX     |
| 110034641635  | 2020 | Benzene                       |                    | 0.0         | 0                             | ALLIED WASTE - MCCARTY ROAD        | 5757 A DATES RD      | HOUSTON TX     |
| 110034641635  | 2020 | Benzene                       |                    | 43,000.0    | 0                             | CHEMICAL RECLAMATION SERVICES AVAL | 405 POWELL ST        | AVALLON TX     |
| 110034641635  | 2020 | Benzene                       |                    | 230.0       | 0                             | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD    | HOUSTON TX     |
| 110034641635  | 2020 | Benzene                       |                    | 0.0         | 0                             | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD    | HOUSTON TX     |
| 110034641635  | 2020 | Benzene                       |                    | 150.0       | 0                             | CHEMICAL RECLAMATION SERVICES AVAL | 405 POWELL ST        | AVALLON TX     |
| 110034641635  | 2020 | Ethylbenzene                  |                    | 6,200.0     | 0                             | CHEMICAL RECLAMATION SERVICES AVAL | 405 POWELL ST        | AVALLON TX     |
| 110034641635  | 2020 | Ethylbenzene                  |                    | 0.1         | 0                             | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD    | HOUSTON TX     |
| 110034641635  | 2020 | Hydroquinone                  |                    | 85.0        | 0                             | ECO SERVICES OPERATIONS HOUSTON    | 8615 MANCHESTER ST   | HOUSTON TX     |
| 110034641635  | 2020 | Mercury And Mercury Compounds |                    | 0.6         | 0                             | GULF WEST LANDFILL TEXAS           | 2601 JENKINS RD      | ANAHUAC TX     |
| 110034641635  | 2020 | Mercury And Mercury Compounds |                    | 0.0         | 0                             | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD    | HOUSTON TX     |
| 110034641635  | 2020 | Mercury And Mercury Compounds |                    | 0.0         | 0                             | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD    | HOUSTON TX     |
| 110034641635  | 2020 | Mercury And Mercury Compounds |                    | 0.1         | 0                             | CHEMICAL RECLAMATION SERVICES AVAL | 405 POWELL ST        | AVALLON TX     |
| 110034641635  | 2020 | Methanol                      |                    | 5,200.0     | 0                             | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD    | HOUSTON TX     |
| 110034641635  | 2020 | Naphthalene                   |                    | 3,300.0     | 0                             | CHEMICAL RECLAMATION SERVICES AVAL | 405 POWELL ST        | AVALLON TX     |
| 110034641635  | 2020 | Naphthalene                   |                    | 2.0         | 0                             | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD    | HOUSTON TX     |
| 110034641635  | 2020 | Naphthalene                   |                    | 0.1         | 0                             | TM DEER PARK SERVICES              | 2525 INDEPENDENCE RD | DEER PARK TX   |
| 110034641635  | 2020 | Styrene                       |                    | 0.0         | 0                             | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD    | HOUSTON TX     |
| 110034641635  | 2020 | Styrene                       |                    | 28.0        | 0                             | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD    | HOUSTON TX     |
| 110034641635  | 2020 | Styrene                       |                    | 5.0         | 0                             | CHEMICAL RECLAMATION SERVICES AVAL | 405 POWELL ST        | AVALLON TX     |
| 110034641635  | 2020 | Styrene                       |                    | 29,000.0    | 0                             | CHEMICAL RECLAMATION SERVICES AVAL | 405 POWELL ST        | AVALLON TX     |
| 110034641635  | 2020 | Styrene                       |                    | 0.2         | 0                             | TM DEER PARK SERVICES              | 2525 INDEPENDENCE RD | DEER PARK TX   |
| 110034641635  | 2020 | Toluene                       |                    | 29,000.0    | 0                             | CHEMICAL RECLAMATION SERVICES AVAL | 405 POWELL ST        | AVALLON TX     |
| 110034641635  | 2020 | Toluene                       |                    | 3.0         | 0                             | TM DEER PARK SERVICES              | 2525 INDEPENDENCE RD | DEER PARK TX   |
| 110034641635  | 2020 | Toluene                       |                    | 0.1         | 0                             | GULF WEST LANDFILL TEXAS           | 2601 JENKINS RD      | ANAHUAC TX     |
| 110034641635  | 2020 | Toluene                       |                    | 20.0        | 0                             | CHEMICAL RECLAMATION SERVICES AVAL | 405 POWELL ST        | AVALLON TX     |
| 110034641635  | 2020 | Toluene                       |                    | 590.0       | 0                             | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD    | HOUSTON TX     |
| 110034641635  | 2020 | Toluene                       |                    | 0.0         | 0                             | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD    | HOUSTON TX     |
| 110034641635  | 2020 | Toluene                       |                    | 24.0        | 0                             | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD    | HOUSTON TX     |
| 110034641635  | 2020 | Toluene                       |                    | 0.5         | 0                             | TM DEER PARK SERVICES              | 2525 INDEPENDENCE RD | DEER PARK TX   |
| 110034641635  | 2020 | Vinyl acetate                 |                    | 2,700,000.0 | 0                             | ECO SERVICES OPERATIONS HOUSTON    | 8615 MANCHESTER ST   | HOUSTON TX     |
| 110034641635  | 2020 | Vinyl acetate                 |                    | 650,000.0   | 0                             | CHEMICAL RECLAMATION SERVICES AVAL | 405 POWELL ST        | AVALLON TX     |

Reporting Year 2020

- It appears your facility has sent approximately 18) shipments (sub eManifest IDs) totaling 595,540 pounds of hazardous waste listed containing Chromium / Chromium compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Chromium / Chromium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Chromium / Chromium compounds for reporting year 2020, if needed.

Again, the facility should have copies of the eManifest.

| H             | I    | J                             | K                  | L    | M                                    | N                    | O             | P              |
|---------------|------|-------------------------------|--------------------|------|--------------------------------------|----------------------|---------------|----------------|
| FRS ID-SENDER | RY   | OFFSITE CHEMICAL NAME         | POUNDS TRANSFERRED | PFAS | SENT TO OFFSITE NAME-RECEIVER        | ADDRESS-RECEIVER     | CITY-RECEIVER | STATE-RECEIVER |
| 110034641635  | 2020 | Benzene                       | 7.7                | 0    | TM DEER PARK SERVICES                | 2525 INDEPENDENCE RD | DEER PARK     | TX             |
| 110034641635  | 2020 | Benzene                       | 18.0               | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Benzene                       | 0.0                | 0    | ALLIED WASTE - MCCARTY ROAD          | 5757 A OATES RD      | HOUSTON       | TX             |
| 110034641635  | 2020 | Benzene                       | 43,000.0           | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Benzene                       | 230.0              | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Benzene                       | 0.0                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Benzene                       | 150.0              | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Ethylbenzene                  | 6,200.0            | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Ethylbenzene                  | 0.1                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Hydroquinone                  | 85.0               | 0    | ECO SERVICES OPERATIONS HOUSTON      | 8615 MANCHESTER ST   | HOUSTON       | TX             |
| 110034641635  | 2020 | Mercury And Mercury Compounds | 0.6                | 0    | GULF WEST LANDFILL TEXAS             | 2601 JENKINS RD      | ANAHUAC       | TX             |
| 110034641635  | 2020 | Mercury And Mercury Compounds | 0.0                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Mercury And Mercury Compounds | 0.0                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Mercury And Mercury Compounds | 0.1                | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Methanol                      | 5,200.0            | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Naphthalene                   | 3,300.0            | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Naphthalene                   | 2.0                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Naphthalene                   | 0.1                | 0    | TM DEER PARK SERVICES                | 2525 INDEPENDENCE RD | DEER PARK     | TX             |
| 110034641635  | 2020 | Styrene                       | 0.0                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Styrene                       | 28.0               | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Styrene                       | 5.0                | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Styrene                       | 29,000.0           | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Styrene                       | 0.2                | 0    | TM DEER PARK SERVICES                | 2525 INDEPENDENCE RD | DEER PARK     | TX             |
| 110034641635  | 2020 | Toluene                       | 29,000.0           | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Toluene                       | 3.0                | 0    | TM DEER PARK SERVICES                | 2525 INDEPENDENCE RD | DEER PARK     | TX             |
| 110034641635  | 2020 | Toluene                       | 0.1                | 0    | GULF WEST LANDFILL TEXAS             | 2601 JENKINS RD      | ANAHUAC       | TX             |
| 110034641635  | 2020 | Toluene                       | 20.0               | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Toluene                       | 590.0              | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Toluene                       | 0.0                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Toluene                       | 24.0               | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Toluene                       | 0.5                | 0    | TM DEER PARK SERVICES                | 2525 INDEPENDENCE RD | DEER PARK     | TX             |
| 110034641635  | 2020 | Vinyl acetate                 | 2,700,000.0        | 0    | ECO SERVICES OPERATIONS HOUSTON      | 8615 MANCHESTER ST   | HOUSTON       | TX             |
| 110034641635  | 2020 | Vinyl acetate                 | 650,000.0          | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |



Morton E. Wakeland, Jr. ("Mort"), Ph.D.

## EPCRA Section 313 Enforcement and TRI

Program Coordinator

U.S. EPA Region 6

Compliance Assurance and Enforcement

Division (ECD)

Waste Enforcement Branch (ECDS)

Toxics Section (ECDST)

Dallas, Texas 75270

(214) 665-8116

**From:** Cobb, Chelsey R <[Chelsey.Cobb@lyondellbasell.com](mailto:Chelsey.Cobb@lyondellbasell.com)>

**Sent:** Thursday, March 24, 2022 8:19 AM

**To:** Wakeland, Morton <[wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov)>

**Cc:** Zucha, C Keith <[C.Zucha@lyondellbasell.com](mailto:C.Zucha@lyondellbasell.com)>; Freed, Christopher L

<[Christopher.Freed@lyondellbasell.com](mailto:Christopher.Freed@lyondellbasell.com)>

**Subject:** EQUISTAR CHEMICALS LP) - (TRIFID: 77571QNTMC1515M) and LYONDELLBASELL ACETYLs LLC) - (TRIFID: 77571QNTMC11603)

Good morning, Mr. Wakeland,

I am following up on an email inquiry for TRI reporting year 2020 for the below facilities.

***EQUISTAR CHEMICALS LP) - (TRIFID: 77571QNTMC1515M)***

***LYONDELLBASELL ACETYS LLC) - (TRIFID: 77571QNTMC11603)***

The facility had recently acquired a couple new units and were going through a transition of name changing and reporting accounts approximately around this time, so it would be helpful to identify exactly which manifests you are referring to. We are not aware of shipping this material occurring in 2020. Could you please send us the manifest numbers referenced below so that we can review and determine if this information is correct?

**The Form R for NO\_VALUE submitted to EPA from your facility: *EQUISTAR CHEMICALS LP) - (TRIFID: 77571QNTMC1515M)* for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 3 hazardous waste shipments (some e-Manifest #:s: 3) totaling 33,134 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

**The Form R for Chromium compounds (except for chromite ore mined in the Transvaal Region) submitted to EPA from your facility: *LYONDELLBASELL ACETYS LLC) - (TRIFID: 77571QNTMC11603)* for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- It appears your facility has sent approximately 18) shipments (sub eManifest IDs) totaling 595,540 pounds of hazardous waste listed containing Chromium / Chromium compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Chromium / Chromium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Chromium / Chromium compounds for reporting year 2020, if needed.

Please let me know if we could have a conference call to discuss further for any clarification needed.

Thank you,

**Chelsey Cobb**

Environmental Engineer

LyondellBasell La Porte Complex

[Chelsey.Cobb@lyondellbasell.com](mailto:Chelsey.Cobb@lyondellbasell.com)

O: 713-209-1672; C: 580-716-3919



**From:** Senthil, Velu <Senthil.Velu@epa.gov>

**Sent:** Thursday, March 24, 2022 5:57 PM

**To:** Wakeland, Morton <wakeland.morton@epa.gov>

**Cc:** Senthil, Velu <Senthil.Velu@epa.gov>

**Subject:** RE: EQUISTAR CHEMICALS LP) - (TRIFID: 77571QNTMC1515M) and LYONDELLBASELL ACETYLS LLC) - (TRIFID: 77571QNTMC11603)

Hi Mort,

I think you have given steps to run offsite transfers using ez query...

Can you please send me those steps again?

Thanks

Velu Senthil

*(Pronoun: he, his)*

US EPA

202-566-0749

**From:** Wakeland, Morton <[wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov)>

**Sent:** Thursday, March 24, 2022 5:00 PM

**To:** Cobb, Chelsey R <[Chelsey.Cobb@lyondellbasell.com](mailto:Chelsey.Cobb@lyondellbasell.com)>

**Cc:** Zucha, C Keith <[C.Zucha@lyondellbasell.com](mailto:C.Zucha@lyondellbasell.com)>; Freed, Christopher L <[Christopher.Freed@lyondellbasell.com](mailto:Christopher.Freed@lyondellbasell.com)>

**Subject:** RE: EQUISTAR CHEMICALS LP) - (TRIFID: 77571QNTMC1515M) and LYONDELLBASELL ACETYLS LLC) - (TRIFID: 77571QNTMC11603)

**Importance:** High

No Mr. here, Mort will do just fine!

I don't have the manifest. The question was generated at HQ's from an eManifest search the TRI Program did.

I simply sent out the questions for the 2 sites.

I ran a report in Envirofacts – TRI Offsite Transfers – attaching my spreadsheets for both sites. **Look at the red tab**

However, you need to check both sites TRI records to see if something was missed.

The sites should have copies of the eManifest for 2020. This may be a regulatory requirement under RCRA?

Thanks for your prompt attention to this matter.

Mort

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfes\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfes_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 3 hazardous waste shipments (some e-Manifest #: 3) totaling 33,134 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

For Equistar – I show no PFAS chemicals being sent offsite – all zero's for a PFAS Identifier

However, your facility should have copies of the eManifest for 2020.

| H             | I    | J                             | K                  | L           | M                                  | N                                  | O                    | P              |
|---------------|------|-------------------------------|--------------------|-------------|------------------------------------|------------------------------------|----------------------|----------------|
| FRS_ID-SENDER | RY   | OFFSITE_CHEMICAL_NAME         | POUNDS_TRANSFERRED | PFAS        | SENT_TO_OFFSITE_NAME-RECEIVER      | ADDRESS-RECEIVER                   | CITY-RECEIVER        | STATE-RECEIVER |
| 110034641635  | 2020 | Benzene                       |                    | 7.7         | 0                                  | TM DEER PARK SERVICES              | 2525 INDEPENDENCE RD | DEER PARK TX   |
| 110034641635  | 2020 | Benzene                       |                    | 18.0        | 0                                  | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD    | HOUSTON TX     |
| 110034641635  | 2020 | Benzene                       |                    | 0.0         | 0                                  | ALLIED WASTE - MCCARTY ROAD        | 5757 A OATES RD      | HOUSTON TX     |
| 110034641635  | 2020 | Benzene                       | 43,000.0           | 0           | CHEMICAL RECLAMATION SERVICES AVAL | 405 POWELL ST                      | AVALLON TX           |                |
| 110034641635  | 2020 | Benzene                       | 230.0              | 0           | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD                  | HOUSTON TX           |                |
| 110034641635  | 2020 | Benzene                       |                    | 0.0         | 0                                  | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD    | HOUSTON TX     |
| 110034641635  | 2020 | Benzene                       |                    | 150.0       | 0                                  | CHEMICAL RECLAMATION SERVICES AVAL | 405 POWELL ST        | AVALLON TX     |
| 110034641635  | 2020 | Ethylbenzene                  |                    | 6,200.0     | 0                                  | CHEMICAL RECLAMATION SERVICES AVAL | 405 POWELL ST        | AVALLON TX     |
| 110034641635  | 2020 | Ethylbenzene                  |                    | 0.1         | 0                                  | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD    | HOUSTON TX     |
| 110034641635  | 2020 | Hydroquinone                  |                    | 85.0        | 0                                  | ECO SERVICES OPERATIONS HOUSTON    | 8615 MANCHESTER ST   | HOUSTON TX     |
| 110034641635  | 2020 | Mercury And Mercury Compounds |                    | 0.6         | 0                                  | GULF WEST LANDFILL TEXAS           | 2601 JENKINS RD      | ANAHUAC TX     |
| 110034641635  | 2020 | Mercury And Mercury Compounds |                    | 0.0         | 0                                  | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD    | HOUSTON TX     |
| 110034641635  | 2020 | Mercury And Mercury Compounds |                    | 0.0         | 0                                  | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD    | HOUSTON TX     |
| 110034641635  | 2020 | Mercury And Mercury Compounds |                    | 0.1         | 0                                  | CHEMICAL RECLAMATION SERVICES AVAL | 405 POWELL ST        | AVALLON TX     |
| 110034641635  | 2020 | Methanol                      |                    | 5,200.0     | 0                                  | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD    | HOUSTON TX     |
| 110034641635  | 2020 | Naphthalene                   |                    | 3,300.0     | 0                                  | CHEMICAL RECLAMATION SERVICES AVAL | 405 POWELL ST        | AVALLON TX     |
| 110034641635  | 2020 | Naphthalene                   |                    | 2.0         | 0                                  | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD    | HOUSTON TX     |
| 110034641635  | 2020 | Naphthalene                   |                    | 0.1         | 0                                  | TM DEER PARK SERVICES              | 2525 INDEPENDENCE RD | DEER PARK TX   |
| 110034641635  | 2020 | Styrene                       |                    | 0.0         | 0                                  | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD    | HOUSTON TX     |
| 110034641635  | 2020 | Styrene                       |                    | 28.0        | 0                                  | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD    | HOUSTON TX     |
| 110034641635  | 2020 | Styrene                       |                    | 5.0         | 0                                  | CHEMICAL RECLAMATION SERVICES AVAL | 405 POWELL ST        | AVALLON TX     |
| 110034641635  | 2020 | Styrene                       |                    | 29,000.0    | 0                                  | CHEMICAL RECLAMATION SERVICES AVAL | 405 POWELL ST        | AVALLON TX     |
| 110034641635  | 2020 | Styrene                       |                    | 0.2         | 0                                  | TM DEER PARK SERVICES              | 2525 INDEPENDENCE RD | DEER PARK TX   |
| 110034641635  | 2020 | Toluene                       |                    | 29,000.0    | 0                                  | CHEMICAL RECLAMATION SERVICES AVAL | 405 POWELL ST        | AVALLON TX     |
| 110034641635  | 2020 | Toluene                       |                    | 3.0         | 0                                  | TM DEER PARK SERVICES              | 2525 INDEPENDENCE RD | DEER PARK TX   |
| 110034641635  | 2020 | Toluene                       |                    | 0.1         | 0                                  | GULF WEST LANDFILL TEXAS           | 2601 JENKINS RD      | ANAHUAC TX     |
| 110034641635  | 2020 | Toluene                       |                    | 20.0        | 0                                  | CHEMICAL RECLAMATION SERVICES AVAL | 405 POWELL ST        | AVALLON TX     |
| 110034641635  | 2020 | Toluene                       |                    | 590.0       | 0                                  | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD    | HOUSTON TX     |
| 110034641635  | 2020 | Toluene                       |                    | 0.0         | 0                                  | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD    | HOUSTON TX     |
| 110034641635  | 2020 | Toluene                       |                    | 24.0        | 0                                  | PHILLIP RECLAMATION SERVICES       | 4050 HOMESTEAD RD    | HOUSTON TX     |
| 110034641635  | 2020 | Toluene                       |                    | 0.5         | 0                                  | TM DEER PARK SERVICES              | 2525 INDEPENDENCE RD | DEER PARK TX   |
| 110034641635  | 2020 | Vinyl acetate                 |                    | 2,700,000.0 | 0                                  | ECO SERVICES OPERATIONS HOUSTON    | 8615 MANCHESTER ST   | HOUSTON TX     |
| 110034641635  | 2020 | Vinyl acetate                 |                    | 650,000.0   | 0                                  | CHEMICAL RECLAMATION SERVICES AVAL | 405 POWELL ST        | AVALLON TX     |

The Form R for Chromium compounds (except for chromite ore mined in the Transvaal Region) submitted to EPA from your facility: **LYONDELLBASELL ACETYLIS LLC** - (TRIFID: **77571QNTMC11603**) for reporting year(s) 2020 has been identified for follow-up due to the following:

Reporting Year 2020

- It appears your facility has sent approximately 18) shipments (sub eManifest IDs) totaling 595,540 pounds of hazardous waste listed containing Chromium / Chromium compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Chromium / Chromium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Chromium / Chromium compounds for reporting year 2020, if needed.

Likewise for LyondellBasell – I show no Chromium/Chromium Compounds sent offsite.

Again, the facility should have copies of the eManifest.

| H             | I    | J                             | K                  | L    | M                                    | N                    | O             | P              |
|---------------|------|-------------------------------|--------------------|------|--------------------------------------|----------------------|---------------|----------------|
| FRS ID-SENDER | RY   | OFFSITE CHEMICAL NAME         | POUNDS TRANSFERRED | PFAS | SENT TO OFFSITE NAME-RECEIVER        | ADDRESS-RECEIVER     | CITY-RECEIVER | STATE-RECEIVER |
| 110034641635  | 2020 | Benzene                       | 7.7                | 0    | TM DEER PARK SERVICES                | 2525 INDEPENDENCE RD | DEER PARK     | TX             |
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| 110034641635  | 2020 | Benzene                       | 0.0                | 0    | ALLIED WASTE - MCCARTY ROAD          | 5757 A OATES RD      | HOUSTON       | TX             |
| 110034641635  | 2020 | Benzene                       | 43,000.0           | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Benzene                       | 230.0              | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Benzene                       | 0.0                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Benzene                       | 150.0              | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Ethylbenzene                  | 6,200.0            | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Ethylbenzene                  | 0.1                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Hydroquinone                  | 85.0               | 0    | ECO SERVICES OPERATIONS HOUSTON      | 8615 MANCHESTER ST   | HOUSTON       | TX             |
| 110034641635  | 2020 | Mercury And Mercury Compounds | 0.6                | 0    | GULF WEST LANDFILL TEXAS             | 2601 JENKINS RD      | ANAHUAC       | TX             |
| 110034641635  | 2020 | Mercury And Mercury Compounds | 0.0                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Mercury And Mercury Compounds | 0.0                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Mercury And Mercury Compounds | 0.1                | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Methanol                      | 5,200.0            | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Naphthalene                   | 3,300.0            | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Naphthalene                   | 2.0                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Naphthalene                   | 0.1                | 0    | TM DEER PARK SERVICES                | 2525 INDEPENDENCE RD | DEER PARK     | TX             |
| 110034641635  | 2020 | Styrene                       | 0.0                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Styrene                       | 28.0               | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Styrene                       | 5.0                | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Styrene                       | 29,000.0           | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Styrene                       | 0.2                | 0    | TM DEER PARK SERVICES                | 2525 INDEPENDENCE RD | DEER PARK     | TX             |
| 110034641635  | 2020 | Toluene                       | 29,000.0           | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Toluene                       | 3.0                | 0    | TM DEER PARK SERVICES                | 2525 INDEPENDENCE RD | DEER PARK     | TX             |
| 110034641635  | 2020 | Toluene                       | 0.1                | 0    | GULF WEST LANDFILL TEXAS             | 2601 JENKINS RD      | ANAHUAC       | TX             |
| 110034641635  | 2020 | Toluene                       | 20.0               | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Toluene                       | 590.0              | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Toluene                       | 0.0                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Toluene                       | 24.0               | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Toluene                       | 0.5                | 0    | TM DEER PARK SERVICES                | 2525 INDEPENDENCE RD | DEER PARK     | TX             |
| 110034641635  | 2020 | Vinyl acetate                 | 2,700,000.0        | 0    | ECO SERVICES OPERATIONS HOUSTON      | 8615 MANCHESTER ST   | HOUSTON       | TX             |
| 110034641635  | 2020 | Vinyl acetate                 | 650,000.0          | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |



Morton E. Wakeland, Jr. ("Mort"), Ph.D.

EPCRA Section 313 Enforcement and TRI

Program Coordinator

U.S. EPA Region 6

Compliance Assurance and Enforcement

Division (ECD)

Waste Enforcement Branch (ECDS)

Toxics Section (ECDST)

Dallas, Texas 75270

(214) 665-8116

**From:** Cobb, Chelsey R <[Chelsey.Cobb@lyondellbasell.com](mailto:Chelsey.Cobb@lyondellbasell.com)>

**Sent:** Thursday, March 24, 2022 8:19 AM

**To:** Wakeland, Morton <[wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov)>

**Cc:** Zucha, C Keith <[C.Zucha@lyondellbasell.com](mailto:C.Zucha@lyondellbasell.com)>; Freed, Christopher L <[Christopher.Freed@lyondellbasell.com](mailto:Christopher.Freed@lyondellbasell.com)>

**Subject:** EQUISTAR CHEMICALS LP) - (TRIFID: 77571QNTMC1515M) and LYONDELLBASELL ACETYLS LLC) - (TRIFID: 77571QNTMC11603)

Good morning, Mr. Wakeland,

I am following up on an email inquiry for TRI reporting year 2020 for the below facilities.

***EQUISTAR CHEMICALS LP) - (TRIFID: 77571QNTMC1515M)***

***LYONDELLBASELL ACETYLS LLC) - (TRIFID: 77571QNTMC11603)***

The facility had recently acquired a couple new units and were going through a transition of name changing and reporting accounts approximately around this time, so it would be helpful to identify exactly which manifests you are referring to. We are not aware of shipping this material occurring in 2020. Could you please send us the manifest numbers referenced below so that we can review and determine if this information is correct?

**The Form R for NO\_VALUE submitted to EPA from your facility: *EQUISTAR CHEMICALS LP) - (TRIFID: 77571QNTMC1515M)* for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 3 hazardous waste shipments (some e-Manifest #s: 3) totaling 33,134 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

**The Form R for Chromium compounds (except for chromite ore mined in the Transvaal Region) submitted to EPA from your facility: *LYONDELLBASELL ACETYLS LLC) - (TRIFID: 77571QNTMC11603)* for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- It appears your facility has sent approximately 18) shipments (sub eManifest IDs) totaling 595,540 pounds of hazardous waste listed containing Chromium / Chromium compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Chromium / Chromium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Chromium / Chromium compounds for reporting year 2020, if needed.

Please let me know if we could have a conference call to discuss further for any clarification needed.

Thank you,

**Chelsey Cobb**

Environmental Engineer

LyondellBasell La Porte Complex

[Chelsey.Cobb@lyondellbasell.com](mailto:Chelsey.Cobb@lyondellbasell.com)

O: 713-209-1672; C: 580-716-3919



## Facility Response – IC-2

**From:** Cobb, Chelsey R <[Chelsey.Cobb@lyondellbasell.com](mailto:Chelsey.Cobb@lyondellbasell.com)>

**Sent:** Thursday, April 7, 2022 2:43 PM

**To:** Wakeland, Morton <[wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov)>; Senthil, Velu <[Senthil.Velu@epa.gov](mailto:Senthil.Velu@epa.gov)>

**Cc:** Zucha, C Keith <[C.Zucha@lyondellbasell.com](mailto:C.Zucha@lyondellbasell.com)>; Freed, Christopher L <[Christopher.Freed@lyondellbasell.com](mailto:Christopher.Freed@lyondellbasell.com)>; McCartney, James Heath <[James.McCartney@lyondellbasell.com](mailto:James.McCartney@lyondellbasell.com)>

**Subject:** RE: EQUISTAR CHEMICALS LP) - (TRIFID: 77571QNTMC1515M) and LYONDELLBASELL ACETYLS LLC) - (TRIFID: 77571QNTMC11603)

Hi, Mort, and Velu,

Thank you for providing the manifest copies. We asked for them to make sure we were comparing apples-to-apples and there was no miscommunication. We verified them with what our records show we shipped offsite and they match. With this in mind, the facility has prepared the following comments:

- 1) To clarify, you are correct that there is a RCRA requirement to maintain copies of the manifests at the facility for 3 years from the date of shipment. We do maintain copies as required, and only wanted the manifest numbers to ensure we were talking about the same shipments and that there was no confusion as described above.
- 2) **PFAS:** There were four shipments in 2019 of PFAs containing materials. These shipments are represented by Manifests 013884892FLE, 013885158FLE, 013885157FLE, and 013231098FLE. All four manifests were shipped prior to midnight on 12/31/19, therefore they would not be reportable on the 2020 TRI (see attached manifest copies). There was no PFAS containing material shipped in 2020.
- 3) **Chromium:** There are multiple waste streams containing chromium that were shipped out during 2020 as identified by the manifests you provided. However, the chromium composition in each of the waste streams is in the parts per million range (0.87 – 187.0 ppm). Based on our calculations of the material shipped, the total chromium shipped was 311.97 pounds. This is below the 10,000 lbs reporting threshold as specified in the Toxic Chemical Release Inventory Reporting Forms and Instructions per “Otherwise Use” chemicals reporting, and therefore was not included in our TRI submittal.

I hope this satisfies your inquiry. Please call me if you have any further questions or need clarification.

Thank you,

**Chelsey Cobb**

Environmental Engineer

LyondellBasell La Porte Complex

[Chelsey.Cobb@lyondellbasell.com](mailto:Chelsey.Cobb@lyondellbasell.com)

O: 713-209-1672; C: 580-716-3919



**From:** Wakeland, Morton <[wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov)>  
**Sent:** Thursday, March 24, 2022 4:00 PM  
**To:** Cobb, Chelsey R <[Chelsey.Cobb@lyondellbasell.com](mailto:Chelsey.Cobb@lyondellbasell.com)>  
**Cc:** Zucha, C Keith <[C.Zucha@lyondellbasell.com](mailto:C.Zucha@lyondellbasell.com)>; Freed, Christopher L <[Christopher.Freed@lyondellbasell.com](mailto:Christopher.Freed@lyondellbasell.com)>  
**Subject:** RE: EQUISTAR CHEMICALS LP) - (TRIFID: 77571QNTMC1515M) and LYONDELLBASELL ACETYS LLC) - (TRIFID: 77571QNTMC11603)  
**Importance:** High

No Mr. here, Mort will do just fine!

I don't have the manifest. The question was generated at HQ's from an eManifest search the TRI Program did.

I simply sent out the questions for the 2 sites.

I ran a report in Envirofacts – TRI Offsite Transfers – attaching my spreadsheets for both sites. **Look at the red tab**

However, you need to check both sites TRI records to see if something was missed.

The sites should have copies of the eManifest for 2020. This may be a regulatory requirement under RCRA?

Thanks for your prompt attention to this matter.

Mort

The Form R for NO\_VALUE submitted to EPA from your facility: **EQUISTAR CHEMICALS LP) - (TRIFID: 77571QNTMC1515M)** for reporting year(s) 2020 has been identified for follow-up due to the following:

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 3 hazardous waste shipments (some e-Manifest #s: 3) totaling 33,134 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

For Equistar – I show no PFAS chemicals being sent offsite – all zero's for a PFAS Identifier

However, your facility should have copies of the eManifest for 2020.

| H             | I    | J                             | K                  | L    | M                                    | N                    | O             | P              |
|---------------|------|-------------------------------|--------------------|------|--------------------------------------|----------------------|---------------|----------------|
| FRS ID-SENDER | RY   | OFFSITE CHEMICAL NAME         | POUNDS TRANSFERRED | PFAS | SENT TO OFFSITE NAME-RECEIVER        | ADDRESS-RECEIVER     | CITY-RECEIVER | STATE-RECEIVER |
| 110034641635  | 2020 | Benzene                       | 7.7                | 0    | TM DEER PARK SERVICES                | 2525 INDEPENDENCE RD | DEER PARK     | TX             |
| 110034641635  | 2020 | Benzene                       | 18.0               | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Benzene                       | 0.0                | 0    | ALLIED WASTE - MCCARTY ROAD          | 5757 A OATES RD      | HOUSTON       | TX             |
| 110034641635  | 2020 | Benzene                       | 43,000.0           | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Benzene                       | 230.0              | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Benzene                       | 0.0                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Benzene                       | 150.0              | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Ethylbenzene                  | 6,200.0            | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Ethylbenzene                  | 0.1                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Hydroquinone                  | 85.0               | 0    | ECO SERVICES OPERATIONS HOUSTON      | 8615 MANCHESTER ST   | HOUSTON       | TX             |
| 110034641635  | 2020 | Mercury And Mercury Compounds | 0.6                | 0    | GULF WEST LANDFILL TEXAS             | 2601 JENKINS RD      | ANAHUAC       | TX             |
| 110034641635  | 2020 | Mercury And Mercury Compounds | 0.0                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Mercury And Mercury Compounds | 0.0                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Mercury And Mercury Compounds | 0.1                | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Methanol                      | 5,200.0            | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Naphthalene                   | 3,300.0            | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Naphthalene                   | 2.0                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Naphthalene                   | 0.1                | 0    | TM DEER PARK SERVICES                | 2525 INDEPENDENCE RD | DEER PARK     | TX             |
| 110034641635  | 2020 | Styrene                       | 0.0                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Styrene                       | 28.0               | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Styrene                       | 5.0                | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Styrene                       | 29,000.0           | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Styrene                       | 0.2                | 0    | TM DEER PARK SERVICES                | 2525 INDEPENDENCE RD | DEER PARK     | TX             |
| 110034641635  | 2020 | Toluene                       | 29,000.0           | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Toluene                       | 3.0                | 0    | TM DEER PARK SERVICES                | 2525 INDEPENDENCE RD | DEER PARK     | TX             |
| 110034641635  | 2020 | Toluene                       | 0.1                | 0    | GULF WEST LANDFILL TEXAS             | 2601 JENKINS RD      | ANAHUAC       | TX             |
| 110034641635  | 2020 | Toluene                       | 20.0               | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Toluene                       | 590.0              | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Toluene                       | 0.0                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Toluene                       | 24.0               | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Toluene                       | 0.5                | 0    | TM DEER PARK SERVICES                | 2525 INDEPENDENCE RD | DEER PARK     | TX             |
| 110034641635  | 2020 | Vinyl acetate                 | 2,700,000.0        | 0    | ECO SERVICES OPERATIONS HOUSTON      | 8615 MANCHESTER ST   | HOUSTON       | TX             |
| 110034641635  | 2020 | Vinyl acetate                 | 650,000.0          | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
|               |      |                               |                    |      |                                      |                      |               |                |
|               |      |                               |                    |      |                                      |                      |               |                |
|               |      |                               |                    |      |                                      |                      |               |                |

The Form R for Chromium compounds (except for chromite ore mined in the Transvaal Region) submitted to EPA from your facility: **LYONDELLBASELL ACETYLs LLC** - (TRIFID: **77571QNTMC11603**) for reporting year(s) 2020 has been identified for follow-up due to the following:

#### Reporting Year 2020

- It appears your facility has sent approximately 18) shipments (sub eManifest IDs) totaling 595,540 pounds of hazardous waste listed containing Chromium / Chromium compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Chromium / Chromium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Chromium / Chromium compounds for reporting year 2020, if needed.

Likewise for LyondellBasell – I show no Chromium/Chromium Compounds sent offsite.

Again, the facility should have copies of the eManifest.

| H             | I    | J                             | K                  | L    | M                                    | N                    | O             | P              |
|---------------|------|-------------------------------|--------------------|------|--------------------------------------|----------------------|---------------|----------------|
| FRS ID-SENDER | RY   | OFFSITE CHEMICAL NAME         | POUNDS TRANSFERRED | PFAS | SENT TO OFFSITE NAME-RECEIVER        | ADDRESS-RECEIVER     | CITY-RECEIVER | STATE-RECEIVER |
| 110034641635  | 2020 | Benzene                       | 7.7                | 0    | TM DEER PARK SERVICES                | 2525 INDEPENDENCE RD | DEER PARK     | TX             |
| 110034641635  | 2020 | Benzene                       | 18.0               | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Benzene                       | 0.0                | 0    | ALLIED WASTE - MCCARTY ROAD          | 5757 A OATES RD      | HOUSTON       | TX             |
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| 110034641635  | 2020 | Benzene                       | 230.0              | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Benzene                       | 0.0                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Benzene                       | 150.0              | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Ethylbenzene                  | 6,200.0            | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Ethylbenzene                  | 0.1                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Hydroquinone                  | 85.0               | 0    | ECO SERVICES OPERATIONS HOUSTON      | 8615 MANCHESTER ST   | HOUSTON       | TX             |
| 110034641635  | 2020 | Mercury And Mercury Compounds | 0.6                | 0    | GULF WEST LANDFILL TEXAS             | 2601 JENKINS RD      | ANAHUAC       | TX             |
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| 110034641635  | 2020 | Mercury And Mercury Compounds | 0.0                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Mercury And Mercury Compounds | 0.1                | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Methanol                      | 5,200.0            | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
| 110034641635  | 2020 | Naphthalene                   | 3,300.0            | 0    | CHEMICAL RECLAMATION SERVICES AVALON | 405 POWELL ST        | AVALON        | TX             |
| 110034641635  | 2020 | Naphthalene                   | 2.0                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
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| 110034641635  | 2020 | Styrene                       | 0.0                | 0    | PHILLIP RECLAMATION SERVICES         | 4050 HOMESTEAD RD    | HOUSTON       | TX             |
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|               |      |                               |                    |      |                                      |                      |               |                |
|               |      |                               |                    |      |                                      |                      |               |                |
|               |      |                               |                    |      |                                      |                      |               |                |



Morton E. Wakeland, Jr. ("Mort"), Ph.D.

## EPCRA Section 313 Enforcement and TRI

Program Coordinator

U.S. EPA Region 6

Compliance Assurance and Enforcement

Division (ECD)

Waste Enforcement Branch (ECDS)

Toxics Section (ECDST)

Dallas, Texas 75270

(214) 665-8116

**From:** Cobb, Chelsey R <[Chelsey.Cobb@lyondellbasell.com](mailto:Chelsey.Cobb@lyondellbasell.com)>

**Sent:** Thursday, March 24, 2022 8:19 AM

**To:** Wakeland, Morton <[wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov)>

**Cc:** Zucha, C Keith <[C.Zucha@lyondellbasell.com](mailto:C.Zucha@lyondellbasell.com)>; Freed, Christopher L <[Christopher.Freed@lyondellbasell.com](mailto:Christopher.Freed@lyondellbasell.com)>

**Subject:** EQUISTAR CHEMICALS LP) - (TRIFID: 77571QNTMC1515M) and LYONDELLBASELL ACETYLs LLC) - (TRIFID: 77571QNTMC11603)

Good morning, Mr. Wakeland,

I am following up on an email inquiry for TRI reporting year 2020 for the below facilities.

***EQUISTAR CHEMICALS LP) - (TRIFID: 77571QNTMC1515M)***

***LYONDELLBASELL ACETYS LLC) - (TRIFID: 77571QNTMC11603)***

The facility had recently acquired a couple new units and were going through a transition of name changing and reporting accounts approximately around this time, so it would be helpful to identify exactly which manifests you are referring to. We are not aware of shipping this material occurring in 2020. Could you please send us the manifest numbers referenced below so that we can review and determine if this information is correct?

**The Form R for NO\_VALUE submitted to EPA from your facility: *EQUISTAR CHEMICALS LP) - (TRIFID: 77571QNTMC1515M)* for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 3 hazardous waste shipments (some e-Manifest #:s: 3) totaling 33,134 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

**The Form R for Chromium compounds (except for chromite ore mined in the Transvaal Region) submitted to EPA from your facility: *LYONDELLBASELL ACETYS LLC) - (TRIFID: 77571QNTMC11603)* for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- It appears your facility has sent approximately 18) shipments (sub eManifest IDs) totaling 595,540 pounds of hazardous waste listed containing Chromium / Chromium compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Chromium / Chromium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Chromium / Chromium compounds for reporting year 2020, if needed.

Please let me know if we could have a conference call to discuss further for any clarification needed.

Thank you,

**Chelsey Cobb**

Environmental Engineer

LyondellBasell La Porte Complex

[Chelsey.Cobb@lyondellbasell.com](mailto:Chelsey.Cobb@lyondellbasell.com)

O: 713-209-1672; C: 580-716-3919



**ISP TECHNOLOGIES INC (77598GFCHMPOBOX)  
4501 ATTWATER AVE, TEXAS CITY, TX 77590 (Region 6)**

**EPA Email – OG-1**

Region 6 Email

03/07/2022 05:37am

From: *Morton Wakeland*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(ISP TECHNOLOGIES INC) (TRIFID: 77598GFCHMPOBOX)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To               | E-Mail Address           |
|-----------------------|--------------------------|
| Self: Morton Wakeland | wakeland.morton@epa.gov  |
| To: DAVID PASTALANIEC | DPASTALANIEC@ASHLAND.COM |
| To: MARK MATSON       | MARK.MATSON@ASHLAND.COM  |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1201 Elm Street Suite 500 DALLAS, TX 75270-2102

**Toxics Release Inventory (TRI) Data Quality Questions [(ISP TECHNOLOGIES INC) (TRIFID: 77598GFCHMPOBOX)]  
Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Mon Mar 07 10:37:47 EST 2022

Dear DAVID PASTALANIEC and MARK MATSON:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: ISP TECHNOLOGIES INC) - (TRIFID: 77598GFCHMPOBOX) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS)

([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 1 hazardous waste shipments (some e-Manifest #: 1) totaling 31,688 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=a757b372-7e55-4d1e-87f7-7846c39c768b&target=15e86b29-4d5e-41f0-b602-04a8830e7709>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Morton Wakeland at [wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Morton Wakeland

**SAN ANTONIO SOUTH REFINED PRODUCTS  
TERMINAL (78221SNNTN10619)  
10619 US HWY 281 S, SAN ANTONIO, TX 78221 (Region 6)**

**EPA Email – OG-1**

Region 6 Email

03/07/2022 05:47am

From: *Morton Wakeland*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(SAN ANTONIO SOUTH REFINED PRODUCTS TERMINAL) (TRIFID: 78221SNNTN10619)] for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To                 | E-Mail Address                 |
|-------------------------|--------------------------------|
| Self: Morton Wakeland   | wakeland.morton@epa.gov        |
| To: CHRISTOPHER BURNETT | CHRISTOPHER.BURNETT@VALERO.COM |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1201 Elm Street Suite 500 DALLAS, TX 75270-2102

**Toxics Release Inventory (TRI) Data Quality Questions [(SAN ANTONIO SOUTH REFINED PRODUCTS TERMINAL) (TRIFID: 78221SNNTN10619)] for Reporting Year(s) 2020 - Due April 29, 2022**

Mon Mar 07 10:47:47 EST 2022

Dear CHRISTOPHER BURNETT:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The for NO\_VALUE submitted to EPA from your facility: SAN ANTONIO SOUTH REFINED PRODUCTS TERMINAL) - (TRIFID: 78221SNNTN10619) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS)

([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 2 hazardous waste shipments (some e-Manifest #: 2) totaling 13,598 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=524769d9-6bc6-4666-ae56-be096bc6b8e3&target=47261512-2fee-4951-9b1b-d7db83a3f08c>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Morton Wakeland at [wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Morton Wakeland

**BOEING AEROSPACE SUPPORT CENTER (78226BNGRS601CR)  
375 AIRLIFT DR 2ND FLOOR COLUMN 43, SAN ANTONIO, TX  
78226 (Region 6)**

**EPA Email – OG-1**

Region 6 Email

03/07/2022 05:22am

From: *Morton Wakeland*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(BOEING AEROSPACE SUPPORT CENTER) (TRIFID: 78226BNGRS601CR)] for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To               | E-Mail Address            |
|-----------------------|---------------------------|
| Self: Morton Wakeland | wakeland.morton@epa.gov   |
| To: ANTHONY SOTO      | ANTHONY.P.SOTO@BOEING.COM |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1201 Elm Street Suite 500 DALLAS, TX 75270-2102

**Toxics Release Inventory (TRI) Data Quality Questions [(BOEING AEROSPACE SUPPORT CENTER) (TRIFID: 78226BNGRS601CR)] for Reporting Year(s) 2020 - Due April 29, 2022**

Mon Mar 07 10:22:29 EST 2022

Dear ANTHONY SOTO:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The for NO\_VALUE submitted to EPA from your facility: BOEING AEROSPACE SUPPORT CENTER) - (TRIFID: 78226BNGRS601CR) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS)

([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 3 hazardous waste shipments (some e-Manifest #: 3) totaling 106,737 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=8ddb09c8-82bf-4708-93f3-b997af12c9ab&target=09dc8879-b6d2-4359-8a3a-c58a60d4e1b4>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

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If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Morton Wakeland at [wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Morton Wakeland

**CALAVERAS POWER STATION (78263WSMMR9599G)  
12940 S US HIGHWAY 181, SAN ANTONIO, TX 78223 (Region 6)**

**EPA Email – OG-1**

Region 6 Email

03/07/2022 05:23am

From: *Morton Wakeland*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(CALAVERAS POWER STATION) (TRIFID: 78263WSMMR9599G)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To               | E-Mail Address           |
|-----------------------|--------------------------|
| Self: Morton Wakeland | wakeland.morton@epa.gov  |
| To: MELISSA SOROLA    | MSOROLA@CPSENERGY.COM    |
| To: ABE GALLEGOS      | ABGALLEGOS@CPSENERGY.COM |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1201 Elm Street Suite 500 DALLAS, TX 75270-2102

**Toxics Release Inventory (TRI) Data Quality Questions [(CALAVERAS POWER STATION) (TRIFID: 78263WSMMR9599G)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Mon Mar 07 10:23:09 EST 2022

Dear MELISSA SOROLA and ABE GALLEGOS:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: CALAVERAS POWER STATION) - (TRIFID: 78263WSMMR9599G) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS)

([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 2 hazardous waste shipments (some e-Manifest #: 2) totaling 13,438 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=20c414d3-fdf2-4c0d-8a80-e5e077c20f8b&target=1dba32c7-eb13-46ce-a15d-53d069d1aa60>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Morton Wakeland at [wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Morton Wakeland

**EPA Email – OG-2**

**From:** Wakeland, Morton <wakeland.morton@epa.gov>  
**Sent:** Tuesday, March 22, 2022 9:37 AM  
**To:** Gallegos, Abraham B. <ABGallegos@CPSEnergy.com>  
**Subject:** RE: [InternetMail] Toxics Release Inventory (TRI) Data Quality Questions [(CALAVERAS POWER STATION) (TRIFID: 78263WSMMR9599G)] Form R for Reporting Year(s) 2020 - Due April 29, 2022  
**Importance:** High

Morning Abe –

You can run a report in EPA's Envirofacts – TRI – **EZ-Search**: <https://enviro.epa.gov/>



In EZ-Search pick the report for off-site transfers.

| Toxic Chemical Releases to the Environment      |   |
|---|---|
| <a href="#">Chemical Discharge to Water</a>     | Total annual toxic chemical release to each receiving surface body of water.                    |
| <a href="#">Chemical Release to Air</a>         | Total annual toxic chemical air emissions.  |
| <a href="#">Chemical Release to Land</a>        | Total annual toxic chemical release to land.  |
| <a href="#">Chemical Underground Injection</a>  | Total annual toxic chemical amount injected into all on-site wells.                             |
| <a href="#">Off Site Transfers for Disposal</a> | Total annual toxic chemical amount transferred to other sites for disposal.                     |
| <a href="#">Combined Releases</a>               | All chemical releases for a facility. Categorized by release category type (WATER, LAND, etc.). |
| <a href="#">Releases - Brief</a>                | A brief view of release information for a facility.   |

In report search, check boxes for data elements you want to retrieve.

Then run search.

Let me do this for you then you should be able to determine the applicability of the data quality questions.

**REMEMBER – eManifest reports total pounds of the waste, NOT THE POUNDS OF TRI CHEMICALS.**

**YOU HAVE TO RELY ON TRI REPORTS TO FIND POUNDS OF TRI CHEMICALS SENT TO A FACILITY.**

Give me a minute or two and will respond back.

A very, very busy morning.

Mort



Morton E. Wakeland, Jr. ("Mort"), Ph.D.

EPCRA Section 313 Enforcement and TRI

Program Coordinator

U.S. EPA Region 6

Compliance Assurance and Enforcement

Division (ECD)

Waste Enforcement Branch (ECDS)

Toxics Section (ECDST)

Dallas, Texas 75270

(214) 665-8116

## Facility Response – IC-1

**From:** Gallegos, Abraham B. <[ABGallegos@CPSEnergy.com](mailto:ABGallegos@CPSEnergy.com)>

**Sent:** Tuesday, March 22, 2022 7:48 AM

**To:** Wakeland, Morton <[wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov)>

**Subject:** FW: [InternetMail] Toxics Release Inventory (TRI) Data Quality Questions [(CALAVERAS POWER STATION) (TRIFID: 78263WSMMR9599G)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

Good Morning Mr. Wakeland. We have been trying to track down the possible Hazardous waste shipments mentioned in this previous email. We do not have any knowledge of any e-manifests submitted from this TRIFID facility. Is it possible to provide the manifest numbers mentioned in brief detail below so that we can investigate further?

Respectfully,

Abe Gallegos

Environmental Coordinator | Water Quality & Planning

CPS Energy | 500 McCollough San Antonio, Texas 78215 | MD: 100406

Office: 210.353.3982 | Mobile: 210.265.9391

[Abgallegos@cpsenergy.com](mailto:Abgallegos@cpsenergy.com)

**From:** [wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov) <[wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov)>

**Sent:** Monday, March 7, 2022 10:04 AM

To: Gallegos, Abraham B. <[ABGallegos@CPSEnergy.com](mailto:ABGallegos@CPSEnergy.com)>; Sorola, Melissa C. <[msorola@cpsenergy.com](mailto:msorola@cpsenergy.com)>; [wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov)

Subject: [InternetMail] Toxics Release Inventory (TRI) Data Quality Questions [(CALAVERAS POWER STATION) (TRIFID: 78263WSMMR9599G)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1201 Elm Street Suite 500 DALLAS, TX 75270-2102

**Toxics Release Inventory (TRI) Data Quality Questions [(CALAVERAS POWER STATION) (TRIFID: 78263WSMMR9599G)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Mon Mar 07 10:23:09 EST 2022

Dear MELISSA SOROLA and ABE GALLEGOS:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: CALAVERAS POWER STATION) - (TRIFID: 78263WSMMR9599G) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 2 hazardous waste shipments (some e-Manifest #: 2) totaling 13,438 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

*Step 1:*

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=20c414d3-fdf2-4c0d-8a80-e5e077c20f8b&target=1dba32c7-eb13-46ce-a15d-53d069d1aa60>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb).  
<https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms>  
[epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Morton Wakeland at [wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Morton Wakeland

### **EPA Email – OG-3**

**From:** Wakeland, Morton <[wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov)>

**Sent:** Tuesday, March 22, 2022 1:10 PM

**To:** Gallegos, Abraham B. <[ABGallegos@CPSEnergy.com](mailto:ABGallegos@CPSEnergy.com)>

**Subject:** RE: [InternetMail] Toxics Release Inventory (TRI) Data Quality Questions [(CALAVERAS POWER STATION) (TRIFID: 78263WSMMR9599G)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

“Abe”

The DQ question regards shipments of PFAS containing waste offsite in 2020, yet not reporting any PFAS chemicals.

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 2 hazardous waste shipments (some e-Manifest #s: 2) totaling 13,438 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

Please check your eManifest to see pounds sent offsite for waste containing PFAS chemicals.

Would help to know the pounds of PFAS vs the total weight of waste.

Thanks Abe,

Mort

#### EPA Email – OG-4

**From:** Senthil, Velu <Senthil.Velu@epa.gov>

**Sent:** Tuesday, March 22, 2022 1:33 PM

**To:** Wakeland, Morton <wakeland.morton@epa.gov>; Gallegos, Abraham B. <ABGallegos@CPSEnergy.com>; Senthil, Velu <Senthil.Velu@epa.gov>

**Subject:** RE: [InternetMail] Toxics Release Inventory (TRI) Data Quality Questions [(CALAVERAS POWER STATION) (TRIFID: 78263WSMMR9599G)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

Please see attached eManifests for your review...

Thanks

Velu Senthil

(Ponoun: he, his)

202-566-0749

**From:** Wakeland, Morton <[wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov)>

**Sent:** Tuesday, March 22, 2022 1:10 PM

**To:** Gallegos, Abraham B. <[ABGallegos@CPSEnergy.com](mailto:ABGallegos@CPSEnergy.com)>

**Subject:** RE: [InternetMail] Toxics Release Inventory (TRI) Data Quality Questions [(CALAVERAS POWER STATION) (TRIFID: 78263WSMMR9599G)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

“Abe”

The DQ question regards shipments of PFAS containing waste offsite in 2020, yet not reporting any PFAS chemicals.

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 2 hazardous waste shipments (some e-Manifest #s: 2) totaling 13,438 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

Please check your eManifest to see pounds sent offsite for waste containing PFAS chemicals.

Would help to know the pounds of PFAS vs the total weight of waste.

Thanks Abe,

Mort

#### EPA Email – OG-5

**From:** Wakeland, Morton <[wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov)>

**Sent:** Tuesday, March 22, 2022 6:43 PM

**To:** Senthil, Velu <[Senthil.Velu@epa.gov](mailto:Senthil.Velu@epa.gov)>; Gallegos, Abraham B. <[ABGallegos@CPSEnergy.com](mailto:ABGallegos@CPSEnergy.com)>

**Subject:** RE: [InternetMail] Toxics Release Inventory (TRI) Data Quality Questions [(CALAVERAS POWER STATION) (TRIFID: 78263WSMMR9599G)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

THANKS FOR HELPING VELU!!

Most appreciate your help as always,

Mort



Morton E. Wakeland, Jr. ("Mort"), Ph.D.

EPCRA Section 313 Enforcement and TRI

Program Coordinator

U.S. EPA Region 6

Compliance Assurance and Enforcement

Division (ECD)

Waste Enforcement Branch (ECDS)

Toxics Section (ECDST)

Dallas, Texas 75270

(214) 665-8116

**From:** Senthil, Velu <[Senthil.Velu@epa.gov](mailto:Senthil.Velu@epa.gov)>

**Sent:** Tuesday, March 22, 2022 12:33 PM

**To:** Wakeland, Morton <[wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov)>; Gallegos, Abraham B. <[ABGallegos@CPSEnergy.com](mailto:ABGallegos@CPSEnergy.com)>; Senthil, Velu <[Senthil.Velu@epa.gov](mailto:Senthil.Velu@epa.gov)>

**Subject:** RE: [InternetMail] Toxics Release Inventory (TRI) Data Quality Questions [(CALAVERAS POWER STATION) (TRIFID: 78263WSMMR9599G)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

Please see attached eManifests for your review...

Thanks

Velu Senthil

(Ponoun: he, his)

202-566-0749

**From:** Wakeland, Morton <[wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov)>

**Sent:** Tuesday, March 22, 2022 1:10 PM

**To:** Gallegos, Abraham B. <[ABGallegos@CPSEnergy.com](mailto:ABGallegos@CPSEnergy.com)>

**Subject:** RE: [InternetMail] Toxics Release Inventory (TRI) Data Quality Questions [(CALAVERAS POWER STATION) (TRIFID: 78263WSMMR9599G)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

"Abe"

The DQ question regards shipments of PFAS containing waste offsite in 2020, yet not reporting any PFAS chemicals.

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 2 hazardous waste shipments (some e-Manifest #s: 2) totaling 13,438 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

Please check your eManifest to see pounds sent offsite for waste containing PFAS chemicals.

Would help to know the pounds of PFAS vs the total weight of waste.

Thanks Abe,

Mort

## Facility Response – IC-2

**From:** Gallegos, Abraham B. <ABGallegos@CPSEnergy.com>

**Sent:** Wednesday, March 23, 2022 9:54 AM

**To:** Senthil, Velu <Senthil.Velu@epa.gov>; Wakeland, Morton <wakeland.morton@epa.gov>

**Subject:** RE: [InternetMail] Toxics Release Inventory (TRI) Data Quality Questions [(CALAVERAS POWER STATION) (TRIFID: 78263WSMMR9599G)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

Thank you very much.

**Abe Gallegos**

Environmental Coordinator | Water Quality & Planning

CPS Energy | 500 McCollough San Antonio, Texas 78215 | MD: 100406

Office: 210.353.3982 | Mobile: 210.265.9391

[Abgallegos@cpsenergy.com](mailto:Abgallegos@cpsenergy.com)

**From:** Senthil, Velu <[Senthil.Velu@epa.gov](mailto:Senthil.Velu@epa.gov)>

**Sent:** Tuesday, March 22, 2022 12:33 PM

**To:** Wakeland, Morton <[wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov)>; Gallegos, Abraham B. <[ABGallegos@CPSEnergy.com](mailto:ABGallegos@CPSEnergy.com)>;

Senthil, Velu <[Senthil.Velu@epa.gov](mailto:Senthil.Velu@epa.gov)>

**Subject:** RE: [InternetMail] Toxics Release Inventory (TRI) Data Quality Questions [(CALAVERAS POWER STATION) (TRIFID: 78263WSMMR9599G)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

Please see attached eManifests for your review...

Thanks

Velu Senthil

(Ponoun: he, his)

202-566-0749

**From:** Wakeland, Morton <[wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov)>

**Sent:** Tuesday, March 22, 2022 1:10 PM

**To:** Gallegos, Abraham B. <[ABGallegos@CPSEnergy.com](mailto:ABGallegos@CPSEnergy.com)>

**Subject:** RE: [InternetMail] Toxics Release Inventory (TRI) Data Quality Questions [(CALAVERAS POWER STATION) (TRIFID: 78263WSMMR9599G)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

"Abe"

The DQ question regards shipments of PFAS containing waste offsite in 2020, yet not reporting any PFAS chemicals.

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 2 hazardous waste shipments (some e-Manifest #s: 2) totaling 13,438 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

Please check your eManifest to see pounds sent offsite for waste containing PFAS chemicals.

Would help to know the pounds of PFAS vs the total weight of waste.

Thanks Abe,

Mort

## EPA Email – OG-6

Headquarters Email

04/27/2022 07:11pm

From: *Velu Senthil*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To                     | E-Mail Address           |
|-----------------------------|--------------------------|
| Cc: wakeland.morton@epa.gov | wakeland.morton@epa.gov  |
| To: MELISSA SOROLA          | MSOROLA@CPSENERGY.COM    |
| To: ABE GALLEGOS            | ABGALLEGOS@CPSENERGY.COM |

Attachments:

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

Wed Apr 27 23:11:18 UTC 2022

Dear MELISSA SOROLA and ABE GALLEGOS:

EPA would like to inform you that data quality issues raised for your facility [CALAVERAS POWER STATION (TRIFID: 78263WSMMR9599G)] during reporting year 2020 Adhoc Data Quality Checks are resolved for the following:

Reporting Year(s) Chemicals

2020 No chemicals

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Velu Senthil

TRI Data Quality Program

US EPA

Email sent on 04/13/2022 02:39pm

CALAVERAS POWER STATION - 78263WSMMR9599G submitted a web response on Apr 13, 2022 2:39:06 PM. A PDF copy of the web response is attached.

### Facility Response – IC-3

Subject: Facility Response Form

Apr 13, 2022 2:39:06 PM

From: Abraham Gallegos

(210) 265-9391

abgallegos@cpsenergy.com

Contractor Company Name: CPS Energy

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

PFAS-NOT-F RY 2020

The source of these releases and quantities are listed below:

| Response            |  | Reporting Year<br>(if applicable) |
|---------------------|--|-----------------------------------|
| No Change           |  |                                   |
| Reason for Response | No change. This was a bulk waste shipment of a fire suppression product which will not be replaced with a PFAS/PFOA product. |                                   |

.....

**U.S. NAVY NAVAL AIR STATION  
KINGSVILLE (78363SNVYK554MC)  
554 MCCAIN ST SUITE 310, KINGSVILLE, TX 78363 (Region 6)**

**EPA Email – OG-1**

Region 6 Email

03/07/2022 05:51am

From: *Morton Wakeland*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(U.S. NAVY NAVAL AIR STATION KINGSVILLE) (TRIFID: 78363SNVYK554MC)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To               | E-Mail Address              |
|-----------------------|-----------------------------|
| Self: Morton Wakeland | wakeland.morton@epa.gov     |
| To: ROD HAFEMEISTER   | RODNEY.HAFEMEISTER@NAVY.MIL |
| To: MARIA BARRERA     | MARIA.BARRERA@NAVY.MIL      |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1201 Elm Street Suite 500 DALLAS, TX 75270-2102

**Toxics Release Inventory (TRI) Data Quality Questions [(U.S. NAVY NAVAL AIR STATION KINGSVILLE) (TRIFID: 78363SNVYK554MC)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Mon Mar 07 10:51:03 EST 2022

Dear MARIA BARRERA and ROD HAFEMEISTER:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: U.S. NAVY NAVAL AIR STATION KINGSVILLE) - (TRIFID: 78363SNVYK554MC) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 1 hazardous waste shipments (some e-Manifest #: 1) totaling 37,525 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=6bf6d3be-bc07-4eb0-bd81-603db7179d81&target=a85eff12-ba39-4912-b70a-30c2373a0fc2>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Morton Wakeland at [wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Morton Wakeland

## EPA Email – OG-2

Headquarters Email

04/04/2022 05:36pm

From: *Velu Senthil*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To                     | E-Mail Address              |
|-----------------------------|-----------------------------|
| Cc: wakeland.morton@epa.gov | wakeland.morton@epa.gov     |
| To: ROD HAFEMEISTER         | RODNEY.HAFEMEISTER@NAVY.MIL |
| To: MARIA BARRERA           | MARIA.BARRERA@NAVY.MIL      |

Attachments:

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

Mon Apr 04 21:36:40 UTC 2022

Dear MARIA BARRERA and ROD HAFEMEISTER:

EPA would like to inform you that data quality issues raised for your facility [U.S. NAVY NAVAL AIR STATION KINGSVILLE (TRIFID: 78363SNVYK554MC)] during reporting year 2020 Adhoc Data Quality Checks are resolved for the following:

#### Reporting Year(s) Chemicals

2020 No chemicals

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Velu Senthil

TRI Data Quality Program

US EPA

Email sent on 04/04/2022 04:02pm

U.S. NAVY NAVAL AIR STATION KINGSVILLE - 78363SNVYK554MC submitted a web response on Apr 4, 2022 4:02:02 PM. A PDF copy of the web response is attached.

## Facility Response – IC-1

Subject: Facility Response Form

From: Maria Norma Barrera

(361) 516-6404

Apr 4, 2022 4:02:02 PM

maria.n.barrera4.civ@us.navy.mil

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

PFAS-NOT-F RY 2020

The source of these releases and quantities are listed below:

| Response            |   | Reporting Year<br>(if applicable) |
|---------------------|---|-----------------------------------|
| No Change           |   |                                   |
| Reason for Response | PFAS is a constituent of Aqueous Film Forming Foam (AFFF) in fire suppression systems at Naval Air Station Kingsville. Naval Air Station Kingsville did not have releases of any PFAS compounds over the 100 pound threshold levels in 2020. Therefore, Form R TRI reporting was not triggered for off-site transfers. Naval Air Station Kingsville did execute a contract to replace the formulation of AFFF in some of our fire suppression systems. The existing AFFF concentrate along with rinsate was collected and sent for disposal on waste manifests. |                                   |

.....

JAVELINA CO (78407JVLNC5314I)

5314 IH 37, CORPUS CHRISTI, TX 78407 (Region 6)

**EPA Email – OG-1**

Region 6 Email

03/07/2022 05:38am

From: *Morton Wakeland*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(JAVELINA CO) (TRIFID: 78407JVLNC5314I)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To               | E-Mail Address          |
|-----------------------|-------------------------|
| Self: Morton Wakeland | wakeland.morton@epa.gov |
| To: HEATHER ALEY      | HALEY@HOWARDEP.COM      |
| To: HEATHER ALEY      | HALEY@HOWARDEP.COM      |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1201 Elm Street Suite 500 DALLAS, TX 75270-2102

**Toxics Release Inventory (TRI) Data Quality Questions [(JAVELINA CO) (TRIFID: 78407JVLNC5314I)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Mon Mar 07 10:37:58 EST 2022

Dear HEATHER ALEY:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Toluene submitted to EPA from your facility: JAVELINA CO) - (TRIFID: 78407JVLNC5314I) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS)

([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 17 hazardous waste shipments (some e-Manifest #s: 17) totaling 423,867 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

- It appears your facility has sent approximately 44) shipments (sub eManifest IDs) totaling 1,207,645 pounds of hazardous waste listed containing Toluene to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Toluene for reporting year 2020. Could you please review your calculations and submit a new report for Toluene for reporting year 2020, if needed.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=e41dfc00-b3bd-4b82-b263-113f43300d04&target=31c286f6-d8ae-4496-b430-3177f2c4ff6e>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Morton Wakeland at [wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Morton Wakeland

## EPA Email – OG-2

**From:** Wakeland, Morton <wakeland.morton@epa.gov>  
**Sent:** Thursday, April 21, 2022 2:57 PM  
**To:** Gautam Agrawala <gka@magenv.com>  
**Cc:** HALEY@HOWARDEP.COM  
**Subject:** RE: TRI Questions on Reporting Year 2020 JAVELINA (TRIFID: 78407JVLNC5314I)  
**Importance:** High

Gautam

I pulled the Javelina reporting for 2020 and found that this site sent no TRI Chemicals offsite.

The only TRI reports for 2020 are for, none of which are PFAS chemicals.

|   | A            |
|---|--------------|
| 1 | TRI_CHEMICAL |
| 2 | Ethylene     |
| 3 | Methanol     |
| 4 | Propylene    |
| 5 |              |

Are you positive this site did not exceed the 100 lbs/yr threshold for PFAS chemicals?

Please double check this site usage of TRI chemicals, including PFAS chemicals to determine

if a TRI chemical exceeded threshold for reporting and was not reported. Not all TRI chemicals have the same threshold amount for reporting.

In reviewing this sites reporting history I discovered late reporting violations.

I doubled checked the EPA self-disclosure database and found no self-disclosure for Javelina for late reporting 2016, 2017, 2018, and 2019.

Javelina reports were late for the following reporting years (RYs):

Reports for 2016 were due to EPA, the State, or the Tribe if located on Tribal lands on or before 7/3/2017 (July 1 fell on a Saturday)

Reports for 2017 were due to EPA, the State, or the Tribe if located on Tribal lands on or before 7/2/2018 (July 1 fell on a Sunday)

Reports for 2018 were due to EPA, the State, or the Tribe if located on Tribal lands on or before 7/1/2019

Reports for 2019 were due to EPA, the State, or the Tribe if located on Tribal lands on or before 7/1/2020

It is a violation of 42 USC § 11023 and 40 CFR § 372 to submit reporting forms after the annual reporting deadline.

To resolve these violations with a Consent Agreement I will need the following information for each RY – 2016, 2017, 2018, and 2019.

1. the number of employees as > or < 50

2. the gross annual revenue of the facility as > or < \$10 million
3. the pounds of **ethylene** used for each RY, including the activity of the TRI chemical: *manufacturing, processing, or otherwise using*
4. the pounds of **methanol** used for each RY, including the activity of the TRI chemical: *manufacturing, processing, or otherwise using*
5. the pounds of **propylene** used for each RY, including the activity of the TRI chemical: *manufacturing, processing, or otherwise using*
6. the state of incorporation of Javelina
7. the **name** of the company official who will sign the consent agreement for the alleged violations
8. the **title** of the company official who will sign the consent agreement for the alleged violations
9. the **email address** of company official who will sign the consent agreement for the alleged violations
10. the **physical address** of company official who will sign the consent agreement for the alleged violations

Once I receive the foregoing information I will prepare a proposed settlement and send to person named as the company official in charge of

Javelina. Thereafter, I will prepare a draft CAFO (Consent Agreement and Final Order) for review by the facility.

Thank you for your immediate attention in this matter.

Mort Wakeland



Morton E. Wakeland, Jr. ("Mort"), Ph.D.

#### EPCRA Section 313 Enforcement and TRI

Program Coordinator

U.S. EPA Region 6

Compliance Assurance and Enforcement

Division (ECD)

Waste Enforcement Branch (ECDS)

Toxics Section (ECDST)

Dallas, Texas 75270

(214) 665-8116

#### Facility Response – IC-1

**From:** Gautam Agrawala <[gka@magenv.com](mailto:gka@magenv.com)>

**Sent:** Thursday, April 21, 2022 11:02 AM

**To:** Wakeland, Morton <[wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov)>

**Subject:** RE: TRI Questions on Reporting Year 2020

Mort:

Please see attached.

Thank you.

Gautam Agrawala, PhD, PE

Director

MAG Consulting & Management Services, LLC (WOSB)

C: 915-253-7415

E: [gka@magenv.com](mailto:gka@magenv.com)

[www.magenv.com](http://www.magenv.com)

**From:** Wakeland, Morton <[wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov)>

**Sent:** Thursday, April 21, 2022 10:54 AM

**To:** Gautam Agrawala <[gka@magenv.com](mailto:gka@magenv.com)>

**Subject:** RE: TRI Questions on Reporting Year 2020

Need you to respond with a copy of original email inquiring about those chemicals.

Thanks,

Mort



Morton E. Wakeland, Jr. ("Mort"), Ph.D.

**EPCRA Section 313 Enforcement and TRI**

**Program Coordinator**

**U.S. EPA Region 6**

**Compliance Assurance and Enforcement**

**Division (ECD)**

**Waste Enforcement Branch (ECDS)**

**Toxics Section (ECDST)**

**Dallas, Texas 75270**

**(214) 665-8116**

## Facility Response – IC-2

**From:** Gautam Agrawala <[gka@magenv.com](mailto:gka@magenv.com)>

**Sent:** Thursday, April 21, 2022 9:18 AM

**To:** Wakeland, Morton <[wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov)>

**Subject:** TRI Questions on Reporting Year 2020

**Importance:** High

Dr. Wakeland:

You had requested TRI reporting info for Toluene and PFAS for one of our clients.

1. Do I update the TRI for Toluene as **REVISED or NEW SUBMISSION** as the total volume is 344 pounds and not reported elsewhere ( see workbook attached).

2. PFAS is 1.28 µg/kg or ppt which is less than 1 % de minimums limit and total volume is 0.05 pounds (see workbook and PFAS Conc. Attached).

Does this need to be reported ?

Please advise and thank you for all the help.

Gautam Agrawala, PhD, PE

Director

MAG Consulting & Management Services, LLC (WOSB)

C: 915-253-7415

E: [gka@magenv.com](mailto:gka@magenv.com)

[www.magenv.com](http://www.magenv.com)

### EPA Email – OG-3

Headquarters Email

05/01/2022 12:11pm

From: *Velu Senthil*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To                     | E-Mail Address          |
|-----------------------------|-------------------------|
| Cc: wakeland.morton@epa.gov | wakeland.morton@epa.gov |
| To: HEATHER ALEY            | HALEY@HOWARDEP.COM      |
| To: HEATHER ALEY            | HALEY@HOWARDEP.COM      |

Attachments:

#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

Sun May 01 16:11:00 UTC 2022

Dear HEATHER ALEY:

EPA would like to inform you that data quality issues raised for your facility [JAVELINA CO (TRIFID: 78407JVLNC5314I)] during reporting year 2020 Adhoc Data Quality Checks are resolved for the following:

Reporting Year(s) Chemicals

2020 Toluene

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Velu Senthil

TRI Data Quality Program

US EPA

Email sent on 04/27/2022 01:40pm

JAVELINA CO - 78407JVLNC5314I submitted a web response on Apr 27, 2022 1:40:18 PM. A PDF copy of the web response is attached.

### Facility Response – IC-3

Subject: Facility Response Form

Apr 27, 2022 1:40:18 PM

From: Heather Aley

(136) 128-94953 haley@howardep.com

Contractor Company Name: Howard Energy Partners

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

EMAN-RNO RY 2020

- It appears your facility has sent approximately 44) shipments (sub eManifest IDs) totaling 1,207,645 pounds of hazardous waste listed containing Toluene to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Toluene for reporting year 2020. Could you please review your calculations and submit a new report for Toluene for reporting year 2020, if needed.

The source of these releases and quantities are listed below:

| Reported Chemical   | Response  | Reporting Year<br>(if applicable) |
|---------------------|---|-----------------------------------|
| Toluene             | New Submission                                      | 2020                              |
| Reason for Response | Toluene was not reported as part of our submission. |                                   |
| PFAS-NOT-F RY 2020  |   |                                   |

The source of these releases and quantities are listed below:

| Response            | Reporting Year<br>(if applicable)  |
|---------------------|--|
| Other               |  |
| Reason for Response | We have no PFAS usage on site other than the one incident that used PFAS to mitigate the spill just outside the plant by the fire department. This waste was manifested and reported under Javelina Plant waste EPA ID. We have looked at all the chemicals on site and there is NO usage of PFAS chemicals in any of the streams. The conc is less than 1% de minimus, PFAS used on the spill |



# US NAVY NAVAL AIR STATION CORPUS CHRISTI (78419NVLRS11001)

8851 OCEAN DR, CORPUS CHRISTI, TX 78419 (Region 6)

## EPA Email – OG-1

Region 6 Email

03/07/2022 05:52am

From: *Morton Wakeland*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(US NAVY NAVAL AIR STATION CORPUS CHRISTI) (TRIFID: 78419NVLRS11001)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To               | E-Mail Address            |
|-----------------------|---------------------------|
| Self: Morton Wakeland | wakeland.morton@epa.gov   |
| To: BIJI PANDISSERIL  | BIJI.PANDISSERIL@NAVY.MIL |
| To: JOHN PHILLIPS     | JOHN.PHILLIPS7@NAVY.MIL   |

Attachments:

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

1201 Elm Street Suite 500 DALLAS, TX 75270-2102

**Toxics Release Inventory (TRI) Data Quality Questions [(US NAVY NAVAL AIR STATION CORPUS CHRISTI) (TRIFID: 78419NVLRS11001)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Mon Mar 07 10:52:47 EST 2022

Dear BIJI PANDISSERIL and JOHN PHILLIPS:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Cadmium compounds and Chromium compounds (except for chromite ore mined in the Transvaal Region) submitted to EPA from your facility: US NAVY NAVAL AIR STATION CORPUS CHRISTI) - (TRIFID: 78419NVLRS11001) for reporting year(s) 2020 has been identified for follow-up due to the following:**

## Reporting Year 2020

- It appears your facility has sent approximately 331 shipments (sub eManifest IDs) totaling 115,700 pounds of hazardous waste listed containing Chromium / Chromium compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Chromium / Chromium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Chromium / Chromium compounds for reporting year 2020, if needed.
- It appears your facility has sent approximately 415 shipments (sub eManifest IDs) totaling 173,798 pounds of hazardous waste listed containing Cadmium / Cadmium compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Cadmium / Cadmium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Cadmium / Cadmium compounds for reporting year 2020, if needed.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 26 hazardous waste shipments (some e-Manifest #s: 26) totaling 724,282 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

### ***How do I respond to this inquiry? (Step 1 is always required)***

#### *Step 1:*

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=e56c89a6-9a34-4bab-830b-7847409bd280&target=529b432e-3318-4d27-8887-0d940473064e>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

#### *Step 2:*

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Morton Wakeland at wakeland.morton@epa.gov.

Thank you for your attention to this matter.

Sincerely,

Morton Wakeland

## EPA Email – OG-2

Headquarters Email

05/01/2022 12:23pm

From: *Velu Senthil*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To                     | E-Mail Address            |
|-----------------------------|---------------------------|
| Cc: wakeland.morton@epa.gov | wakeland.morton@epa.gov   |
| To: BIJI PANDISSERIL        | BIJI.PANDISSERIL@NAVY.MIL |
| To: JOHN PHILLIPS           | JOHN.PHILLIPS7@NAVY.MIL   |

Attachments:

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

Sun May 01 16:23:07 UTC 2022

Dear BIJI PANDISSERIL and JOHN PHILLIPS:

EPA would like to inform you that data quality issues raised for your facility [US NAVY NAVAL AIR STATION CORPUS CHRISTI (TRIFID: 78419NVLRS11001)] during reporting year 2020 Adhoc Data Quality Checks are resolved for the following:

#### Reporting Year(s) Chemicals

2020 Cadmium compounds and Chromium compounds (except for chromite ore mined in the Transvaal Region)

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Velu Senthil

TRI Data Quality Program

US EPA

Email sent on 04/19/2022 07:43pm

US NAVY NAVAL AIR STATION CORPUS CHRISTI - 78419NVLRS11001 submitted a web response on Apr 19, 2022 7:43:16 PM. A PDF copy of the web response is attached.

### Facility Response – IC-1

Subject: Facility Response Form

Apr 19, 2022 7:43:16 PM

From: Biji Pandisseril

(361) 961-5353

biji.a.pandisseril.civ@us.navy.mil

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

EMAN-RNO RY 2020

- It appears your facility has sent approximately 331) shipments (sub eManifest IDs) totaling 115,700 pounds of hazardous waste listed containing Chromium / Chromium compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Chromium / Chromium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Chromium / Chromium compounds for reporting year 2020, if needed.
- It appears your facility has sent approximately 415) shipments (sub eManifest IDs) totaling 173,798 pounds of hazardous waste listed containing Cadmium / Cadmium compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Cadmium / Cadmium compounds for reporting year 2020. Could you please review your calculations and submit a new report for Cadmium / Cadmium compounds for reporting year 2020, if needed.

The source of these releases and quantities are listed below:

| Reported Chemical   | Reporting Year (if Response applicable)  |
|---------------------|--|
| Cadmium compounds   | No Change  |
| Reason for Response | In RY 2020, Cadmium compounds usage at NASCC did not approach or exceed the EPA's TRI threshold of 10,000 pounds for otherwise used, or 25,000 pounds for manufacturing or processing. Since no thresholds were exceeded, no Form R's were required that would include any off-site transfers. Waste generation from RY 2020 was evaluated to determine any pathways which should be included in the TRI threshold evaluation for RY 2020. Waste transfers in RY 2020 were |

| Reported Chemical  | Reporting Year<br>(if applicable)<br>Response   |
|--|---|
|  | assigned the chromium waste code based on TCLP analysis or Safety Data Sheets. The waste that is shipped out had cadmium as a constituent and was not pure cadmium.   |
| Chromium compounds (except for chromite ore mined in the Transvaal Region) | No Change   |
| Reason for Response  | In RY 2020, Chromium compounds usage at NASCC did not approach or exceed the EPA's TRI threshold of 10,000 pounds for otherwise used, or 25,000 pounds for manufacturing or processing. Since no thresholds were exceeded, no Form R's were required that would include any off-site transfers. Waste generation from RY 2020 was evaluated to determine any pathways which should be included in the TRI threshold evaluation for RY 2020. Waste transfers in RY 2020 were assigned the chromium waste code based on TCLP analysis or Safety Data Sheets. The waste that is shipped out had chromium as a constituent and was not pure chromium. |

PFAS-NOT-F RY 2020

The source of these releases and quantities are listed below:

| Response            | Reporting Year<br>(if applicable)   |
|---------------------|---|
| No Change           |   |
| Reason for Response | PFAS is a constituent in fire suppression systems at NASCC. NASCC did not have releases of any PFAS compounds over the 100 pound threshold levels. Therefore, Form R TRI reporting was not triggered for off-site transfers. NASCC did execute a contract to replace the formulation of AFFF in our fire suppression systems with the replacement AFFF containing significantly lower levels of PFAS. The existing AFFF along with rinsate was collected and disposed off without release on waste manifests. |

.....

**US ARMY 1ST ARMORED DIV & FORT BLISS  
RANGES (79916SRMYRTAYLO)  
TAYLOR RD ATTN: IMBL PWE BLDG 622, FORT BLISS, TX  
79916 (Region 6)**

**EPA Email – OG-1**

Region 6 Email

03/07/2022 05:51am

From: *Morton Wakeland*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(US ARMY 1ST ARMORED DIV & FORT BLISS RANGES) (TRIFID: 79916SRMYRTAYLO)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To               | E-Mail Address             |
|-----------------------|----------------------------|
| Self: Morton Wakeland | wakeland.morton@epa.gov    |
| To: PAUL RAISCH       | PAUL.C.RAISCH.CIV@MAIL.MIL |
| To: PAUL RAISCH       | PAUL.C.RAISCH.CIV@MAIL.MIL |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1201 Elm Street Suite 500 DALLAS, TX 75270-2102

**Toxics Release Inventory (TRI) Data Quality Questions [(US ARMY 1ST ARMORED DIV & FORT BLISS RANGES) (TRIFID: 79916SRMYRTAYLO)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Mon Mar 07 10:51:41 EST 2022

Dear PAUL RAISCH:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

The Form R for NO\_VALUE submitted to EPA from your facility: **US ARMY 1ST ARMORED DIV & FORT BLISS RANGES** - (TRIFID: 79916SRMYRTAYLO) for reporting year(s) 2020 has been identified for follow-up due to the following:

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 2 hazardous waste shipments (some e-Manifest #: 2) totaling 8,681 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

*Step 1:*

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=feac610c-953f-447e-9287-125835019fb8&target=a14c667d-b45d-47b8-a68f-66f2a346c77c>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

*Step 2:*

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Morton Wakeland at [wakeland.morton@epa.gov](mailto:wakeland.morton@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Morton Wakeland

## EPA Email – OG-2

Headquarters Email

03/09/2022 12:46pm

From: *Velu Senthil*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To                     | E-Mail Address             |
|-----------------------------|----------------------------|
| Cc: wakeland.morton@epa.gov | wakeland.morton@epa.gov    |
| To: PAUL RAISCH             | PAUL.C.RAISCH.CIV@MAIL.MIL |
| To: PAUL RAISCH             | PAUL.C.RAISCH.CIV@MAIL.MIL |

Attachments:

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

1200 Pennsylvania Avenue NW WASHINGTON, DC 20460

Wed Mar 09 17:46:06 EST 2022

Dear PAUL RAISCH:

EPA would like to inform you that data quality issues raised for your facility [US ARMY 1ST ARMORED DIV & FORT BLISS RANGES (TRIFID: 79916SRMYRTAYLO)] during reporting year 2020 National Analysis Data Quality Checks cycle are resolved for the following:

#### Reporting Year(s) Chemicals

2020 PFAS chemicals

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Velu Senthil

TRI Data Quality Program

US EPA

Email sent on 03/08/2022 01:13pm

US ARMY 1ST ARMORED DIV & FORT BLISS RANGES - 79916SRMYRTAYLO submitted a web response on Mar 8, 2022 6:12:40 PM. A PDF copy of the web response is attached.

## Facility Response – IC-1

Subject: Facility Response Form  
From: Paul Raisch

(915) 568-2638

Mar 8, 2022 6:12:40 PM  
paul.c.raisch.civ@army.mil

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

PFAS-NOT-F RY 2020

The source of these releases and quantities are listed below:

| Response            |  | Reporting Year<br>(if applicable) |
|---------------------|--|-----------------------------------|
| No Change           |  |                                   |
| Reason for Response | The amount of AFFF disposed of in FY2020 consisted of 3006 gallons (2506 gallons in fire department vehicles and 500 gallons of bench stock) of concentrate (Tyco Fire Protection Products TFPP and Chemguard Inc. and 5675 gallons of rise-aid (water from triple rising of the fire department vehicle holding tanks). TFPP/Chemguard has historically performed focused testing to quantify the levels of PFOA and PFOS in certain AFFF products. This data suggests average concentrations for PFOA/PFOS of less than 1 ppm. A concentration of 1 ppm PFOA/PFOS would suggest that the 1 pound regulatory threshold for environmental releases of PFOA(hazardous chemical) would be contained in 1 million pounds of AFFF concentrate. |                                   |

.....

**L3 TECHNOLOGIES INC (85281LTTNS1215S)**  
**1215 S 52ND ST, TEMPE, AZ 85281 (Region 9)**

**EPA Contractor Email – OG-1**

Contractor Email

03/28/2022 09:23am

From: *Abigail Burton*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(L3 TECHNOLOGIES INC) (TRIFID: 85281LTTNS1215S)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To              | E-Mail Address          |
|----------------------|-------------------------|
| Self: Abigail Burton | abby.burton@erg.com     |
| To: MARY PARKE       | MARY.PARKE@L3HARRIS.COM |
| To: MARY PARKE       | MARY.PARKE@L3HARRIS.COM |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(L3 TECHNOLOGIES INC) (TRIFID: 85281LTTNS1215S)]  
Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Mon Mar 28 13:23:42 UTC 2022

Dear MARY PARKE:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: L3 TECHNOLOGIES INC) - (TRIFID: 85281LTTNS1215S) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI),

and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 2 hazardous waste shipments (some e-Manifest #: 2) totaling 55,260 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=94e5dc18-99fb-4dd2-a326-15dee8b60f86&target=d55eee98-833a-4c25-9588-6f400400e094>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

**EPA Contractor Email – OG-2**

Contractor Email

03/28/2022 04:13pm

From: Abigail Burton

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To              | E-Mail Address          |
|----------------------|-------------------------|
| Self: Abigail Burton | abby.burton@erg.com     |
| To: MARY PARKE       | MARY.PARKE@L3HARRIS.COM |
| To: MARY PARKE       | MARY.PARKE@L3HARRIS.COM |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Region 9

Mon Mar 28 20:13:23 UTC 2022

Dear MARY PARKE:

EPA would like to inform you that data quality issues raised for your facility [L3 TECHNOLOGIES INC (TRIFID: 85281LTTNS1215S)] during reporting year 2020 Adhoc Data Quality Checks are resolved for the following:

Reporting Year(s) Chemicals

2020 No chemicals

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Abigail Burton

TRI Data Quality Program

US EPA

Region 9

**Email sent on 03/28/2022 01:23pm**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(L3 TECHNOLOGIES INC) (TRIFID: 85281LTTNS1215S)]  
Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Mon Mar 28 13:23:42 UTC 2022

Dear MARY PARKE:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: L3 TECHNOLOGIES INC) - (TRIFID: 852811TTNS1215S) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 2 hazardous waste shipments (some e-Manifest #s: 2) totaling 55,260 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

*Step 1:*

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=94e5dc18-99fb-4dd2-a326-15dee8b60f86&target=d55eee98-833a-4c25-9588-6f400400e094>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

*Step 2:*

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at abby.burton@erg.com.

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

### Facility Response – IC-1

Subject: Facility Response Form  
From: Mary Parke

Mar 28, 2022 2:45:12 PM  
(480) 375-3239  
mary.parke@l3harris.com

Contractor Company Name: L3Harris (United States)  
(l3harris.com)

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

PFAS-NOT-F RY 2020

The source of these releases and quantities are listed below:

| Response            |   | Reporting Year<br>(if applicable) |
|---------------------|---|-----------------------------------|
| No Change           |   |                                   |
| Reason for Response | L3 Technologies did not ship any hazardous wastes containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm in 2020. L3 Technologies does use and recycle a fluorinated solvent, but the compound is not listed on the EPA's list of chemicals covered by TRI. |                                   |

.....

**US ECOLOGY NEVADA INC (89003SCLGYHWY95)  
12 MILES S OF BEATTY ON HWY 95, BEATTY, NV 89003 (Region  
9)**

**EPA Contractor Email – OG-1**

Contractor Email

07/27/2021 10:55am

From: *Abigail Burton*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(US ECOLOGY NEVADA INC) (TRIFID: 89003SCLGYHWY95)] for RY 2020 - Due September 10, 2021

| Sent To              | E-Mail Address                 |
|----------------------|--------------------------------|
| Self: Abigail Burton | abby.burton@erg.com            |
| To: DANIEL CHURCH    | DANIEL.CHURCH@USECOLOGY.COM    |
| To: AMANDA RASMUSSEN | AMANDA.RASMUSSEN@USECOLOGY.COM |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(US ECOLOGY NEVADA INC) (TRIFID: 89003SCLGYHWY95)]  
Form R for Reporting Year(s) 2020 - Due September 10, 2021**

Tue Jul 27 14:54:01 EDT 2021

Dear AMANDA RASMUSSEN and DANIEL CHURCH:

This email message is part of an annual data quality check EPA conducts before releasing its Toxics Release Inventory National Analysis. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Asbestos (friable), Diisocyanates, Lead, Nickel, Phosphoric acid, γ-ω-perfluoro-C8-16-alkyl esters, compds. with diethanolamine and Polychlorinated biphenyls submitted to EPA from your facility [(Name: US ECOLOGY NEVADA INC) - (TRIFID: 89003SCLGYHWY95)] for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Your facility reported 394,413 pounds of Total on-site disposal to UIC Class I Wells, RCRA Subtitle C landfills and other landfills for Nickel in the current year. This was a decrease of 416,227 pounds from the previous year amount of 810,640 pounds.
- Your facility reported total release of 6,924,506.4 pounds for reporting year 2020; and this quantity is a decrease of 2,429,064.53 pounds compared to your prior reporting year 2019 reported total production waste amount of 9,353,570.93 pounds. Please review your calculations and submit a revised reports for reporting year 2020, if needed.
- Your facility reported 76,353 pounds of Total Land Release for Asbestos (friable) in the current year. This was a decrease of 526,432 pounds from the previous year amount of 602,785 pounds.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Phosphoric acid, γ-ω-perfluoro-C8-16-alkyl esters, compds. with diethanolamine to TRI for reporting year 2020, but might have received Phosphoric acid, γ-ω-perfluoro-C8-16-alkyl esters, compds. with diethanolamine in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Phosphoric acid, γ-ω-perfluoro-C8-16-alkyl esters, compds. with diethanolamine for reporting year 2020, if required.
- Your facility reported 1,675,802 pounds of RCRA Subtitle C Landfills for Lead in the current year 2020. This was a decrease of 199,456 pounds from the previous year amount of 1,875,258 pounds.
- Your facility reported 179,694 pounds of RCRA Subtitle C Landfills for Polychlorinated biphenyls in the current year 2020. This was an increase of 37,643 pounds from the previous year amount of 142,051 pounds.
- Your facility reported 169,165 pounds of Total Land Release for Diisocyanates. This was an increase of 157,665 pounds from the previous year amount of 11,500 pounds.

***How do I respond to this inquiry?***

***Step 1:***

Please respond by answering the questions on the following questionnaire:

<https://cdxnodengn.epa.gov/cdx-tri-quest/questionnaire?survey=75252cb8-c480-445a-891e-d397d1554bbf&target=41a7fe94-bea6-48e5-8a50-8aca8a5e8517>

***If you indicate new submission, revision or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you would like to make any revisions, withdrawals or new submissions, **please send them to EPA by September 10, 2021.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have any follow up questions, please contact Abby Burton at (908) 251-7161 or email at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abby Burton

**ERG (EPA Contractor) on behalf of** EPA Region 9

### **EPA Contractor Email – OG-2**

Contractor Email

08/03/2021 05:34am

From: *Abigail Burton*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To              | E-Mail Address   |
|----------------------|--|
| Self: Abigail Burton | <a href="mailto:abby.burton@erg.com">abby.burton@erg.com</a>                       |
| To: DANIEL CHURCH    | <a href="mailto:DANIEL.CHURCH@USECOLOGY.COM">DANIEL.CHURCH@USECOLOGY.COM</a>       |
| To: AMANDA RASMUSSEN | <a href="mailto:AMANDA.RASMUSSEN@USECOLOGY.COM">AMANDA.RASMUSSEN@USECOLOGY.COM</a> |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Region 9

Tue Aug 03 09:34:31 EDT 2021

Dear DANIEL CHURCH and AMANDA RASMUSEN:

EPA would like to inform you that data quality issues raised for your facility [US ECOLOGY NEVADA INC (TRIFID: 89003SCLGYHWY95)] during reporting year 2020 Adhoc Data Quality Checks cycle are resolved for the following:

#### Reporting Year(s) Chemicals

2020 Asbestos (friable), Diisocyanates, Lead, Nickel, Phosphoric acid, γ-ω-perfluoro-C8-16-alkyl esters, compds. with diethanolamine and Polychlorinated biphenyls

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Abby Burton

**ERG (EPA Contractor) on behalf of**

TRI Data Quality Program

US EPA

Region 9

**Email sent on 08/02/2021 04:02pm**

US ECOLOGY NEVADA INC - 89003SCLGYHWY95 submitted a web response on Aug 2, 2021 4:01:47 PM. A PDF copy of the web response is attached.

### Facility Response – IC-1

Subject: Facility Response Form

Aug 2, 2021 4:01:47 PM

From: Amanda Rasmussen

(775) 553-2203 amanda.rasmussen@usecology.com

Contractor Company Name: US Ecology Nevada

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

DEC-R562-F RY 2020

The source of these releases and quantities are listed below:

| Response            | Reporting Year<br>(if applicable)   |
|---------------------|---|
| No Change           |   |
| Reason for Response | No change is required as the facility received less waste for treatment and disposal in reporting year 2020 due to the COVID-19 pandemic. |
| HAPS-REL RY 2020    |   |

- Your facility reported 169,165 pounds of Total Land Release for Diisocyanates. This was an increase of 157,665 pounds from the previous year amount of 11,500 pounds.

The source of these releases and quantities are listed below:

| Reported Chemical   | Response  | Reporting Year<br>(if applicable) |
|---------------------|---|-----------------------------------|
| Diisocyanates       | No Change   |                                   |
| Reason for Response | The facility updated it's operating system to more accurately report all forms of Diisocyanates. The reported quantity for reporting year 2020 is accurate. |                                   |

PBT-CNG-LND RY 2020

- Your facility reported 1,675,802 pounds of RCRA Subtitle C Landfills for Lead in the current year 2020. This was a decrease of 199,456 pounds from the previous year amount of 1,875,258 pounds.
- Your facility reported 179,694 pounds of RCRA Subtitle C Landfills for Polychlorinated biphenyls in the current year 2020. This was an increase of 37,643 pounds from the previous year amount of 142,051 pounds.

The source of these releases and quantities are listed below:

| Reported Chemical         | Response   | Reporting Year<br>(if applicable) |
|---------------------------|--|-----------------------------------|
| Lead                      | No Change  |                                   |
| Reason for Response       | No change is required as the facility received less waste contaminated with lead for treatment and disposal in reporting year 2020 due to the COVID-19 pandemic. |                                   |
| Polychlorinated biphenyls | No Change  |                                   |
| Reason for Response       | No change is required as the facility received more contaminated with polychlorinated biphenyls in reporting year 2020 than in 2019.                             |                                   |

#### PFAS-NOT RY 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility has not submitted any report for Phosphoric acid, γ-w-perfluoro-C8-16-alkyl esters, compds. with diethanolamine to TRI for reporting year 2020, but might have received Phosphoric acid, γ-w-perfluoro-C8-16-alkyl esters, compds. with diethanolamine in excess of processing / otherwise use reporting threshold amounts from one or more TRI facilities for waste management activities such as disposal and/or treatment. Please review and submit new report for Phosphoric acid, γ-w-perfluoro-C8-16-alkyl esters, compds. with diethanolamine for reporting year 2020, if required.

The source of these releases and quantities are listed below:

| Reported Chemical  | Response   | Reporting Year<br>(if applicable) |
|--|--|-----------------------------------|
| Phosphoric acid, γ-w-perfluoro-C8-16-alkyl esters, compds. with diethanolamine | No Change  |                                   |
| Reason for Response  | The facility did not receive any waste containing Phosphoric acid, γ-w-perfluoro-C8-16-alkyl esters, compds. with diethanolamine in reporting year 2020. |                                   |

#### TSCA-CNG-REL RY 2020

- Your facility reported 394,413 pounds of Total on-site disposal to UIC Class I Wells, RCRA Subtitle C landfills and other landfills for Nickel in the current year. This was a decrease of 416,227 pounds from the previous year amount of 810,640 pounds.
- Your facility reported 76,353 pounds of Total Land Release for Asbestos (friable) in the current year. This was a decrease of 526,432 pounds from the previous year amount of 602,785 pounds.

The source of these releases and quantities are listed below:

| Reported Chemical   | Response   | Reporting Year<br>(if applicable) |
|---------------------|--|-----------------------------------|
| Asbestos (friable)  | New Submission   | 2020                              |
| Reason for Response | The data entered for reporting year 2020 for Asbestos (friable) was entered in error. A new submission has been submitted. Decreased Total Land Release is expected for 2020 due to the COVID-19 pandemic. |                                   |
| Nickel              | No Change  |                                   |
| Reason for Response | No change is required as the facility received less waste contaminated with nickel for treatment and disposal in reporting year 2020 due to the COVID-19 pandemic.   |                                   |

**21ST CENTURY ENVIRONMENTAL MANAGEMENT OF NEVADA  
LLC (89408CNTRY2095N)  
2095 NEWLANDS DR E, FERNLEY, NV 89408 (Region 9)**

**EPA Contractor Email – OG-1**

Contractor Email

03/25/2022 05:47am

From: *Abigail Burton*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(21ST CENTURY ENVIRONMENTAL MANAGEMENT OF NEVADA LLC) (TRIFID: 89408CNTRY2095N)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To              | E-Mail Address      |
|----------------------|---------------------|
| Self: Abigail Burton | abby.burton@erg.com |
| To: JEFFREY DAVIS    | JDAVIS2@HARSCO.COM  |
| To: JEFFREY DAVIS    | JDAVIS2@HARSCO.COM  |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(21ST CENTURY ENVIRONMENTAL MANAGEMENT OF NEVADA LLC) (TRIFID: 89408CNTRY2095N)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Fri Mar 25 09:45:51 EDT 2022

Dear JEFFREY DAVIS:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for 1,1,1-Trichloroethane, 1-Bromopropane, 2-Mercaptobenzothiazole, 4,4'-Methylenedianiline, Cyanide compounds, Dibutyl phthalate, Diethanolamine, Dimethyl phthalate, Ethylene glycol, Formaldehyde, Lithium carbonate, Malathion, Methanol, N-Methyl-2-pyrrolidone, Styrene, Tetrafluoroethylene, Toluene, Xylene (mixed isomers) and Zinc compounds submitted to EPA from your facility: 21ST CENTURY ENVIRONMENTAL MANAGEMENT OF NEVADA LLC) - (TRIFID: 89408CNTRY2095N) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Your facility appeared to have received approximately 42,228 POUNDS of N-Methyl-2-pyrrolidone for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for N-Methyl-2-pyrrolidone for reporting year 2020. Please review your calculations and submit new report for N-Methyl-2-pyrrolidone for reporting year 2020, if needed.
- It appears your facility has received approximately 70 shipments (sub eManifest IDs) totaling 149,308 pounds of hazardous waste listed containing Cyanide compounds from several TRI facilities for reporting year 2020, but your facility does not appear to have reported for Cyanide compounds for reporting year 2020. Could you please review your calculations and submit a new report for Cyanide compounds for reporting year 2020, if needed.
- It appears your facility has sent approximately 246 shipments (sub eManifest IDs) totaling 1,475,158 pounds of hazardous waste listed containing Toluene to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Toluene for reporting year 2020. Could you please review your calculations and submit a new report for Toluene for reporting year 2020, if needed.
- Your facility appeared to have received approximately 40,171 POUNDS of 1-Bromopropane for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for 1-Bromopropane for reporting year 2020. Please review your calculations and submit new report for 1-Bromopropane for reporting year 2020, if needed.
- Your facility appeared to have received approximately 136,771 POUNDS of Toluene for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Toluene for reporting year 2020. Please review your calculations and submit new report for Toluene for reporting year 2020, if needed.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have received approximately 20 hazardous waste shipments (some e-Manifest #:s: 20) totaling 35,816 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.
- Your facility appeared to have received approximately 22,351 POUNDS of 4,4'-Methylenedianiline for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for 4,4'-Methylenedianiline for reporting year 2020. Please review your calculations and submit new report for 4,4'-Methylenedianiline for reporting year 2020, if needed.
- Your facility appeared to have received approximately 24,911 POUNDS of Tetrafluoroethylene for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Tetrafluoroethylene for reporting year 2020. Please review your calculations and submit new report for Tetrafluoroethylene for reporting year 2020, if needed.
- Your facility appeared to have received approximately 32,279 POUNDS of Lithium carbonate for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Lithium carbonate for reporting year 2020. Please review your calculations and submit new report for Lithium carbonate for reporting year 2020, if needed.
- Your facility appeared to have received approximately 139,540 POUNDS of Xylene (mixed isomers) for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Xylene (mixed isomers) for reporting year 2020. Please review your calculations and submit new report for Xylene (mixed isomers) for reporting year 2020, if needed.

- It appears your facility has sent approximately 81 shipments (sub eManifest IDs) totaling 149,812 pounds of hazardous waste listed containing Cyanide compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Cyanide compounds for reporting year 2020. Could you please review your calculations and submit a new report for Cyanide compounds for reporting year 2020, if needed.
- Your facility appeared to have received approximately 32,865 POUNDS of Dimethyl phthalate for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Dimethyl phthalate for reporting year 2020. Please review your calculations and submit new report for Dimethyl phthalate for reporting year 2020, if needed.
- Your facility appeared to have received approximately 59,902 POUNDS of Dibutyl phthalate for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Dibutyl phthalate for reporting year 2020. Please review your calculations and submit new report for Dibutyl phthalate for reporting year 2020, if needed.
- Your facility appeared to have received approximately 174,090 POUNDS of Methanol for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Methanol for reporting year 2020. Please review your calculations and submit new report for Methanol for reporting year 2020, if needed.
- It appears your facility has received approximately 66 shipments (sub eManifest IDs) totaling 143,919 pounds of hazardous waste listed containing Malathion from several TRI facilities for reporting year 2020, but your facility does not appear to have reported for Malathion for reporting year 2020. Could you please review your calculations and submit a new report for Malathion for reporting year 2020, if needed.
- Your facility appeared to have received approximately 35,224 POUNDS of Styrene for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Styrene for reporting year 2020. Please review your calculations and submit new report for Styrene for reporting year 2020, if needed.
- Your facility appeared to have received approximately 58,102 POUNDS of 1,1,1-Trichloroethane for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for 1,1,1-Trichloroethane for reporting year 2020. Please review your calculations and submit new report for 1,1,1-Trichloroethane for reporting year 2020, if needed.
- Your facility appeared to have received approximately 68,208 POUNDS of Formaldehyde for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Formaldehyde for reporting year 2020. Please review your calculations and submit new report for Formaldehyde for reporting year 2020, if needed.
- Your facility appeared to have received approximately 19,143 POUNDS of Diethanolamine for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Diethanolamine for reporting year 2020. Please review your calculations and submit new report for Diethanolamine for reporting year 2020, if needed.
- Your facility appeared to have received approximately 15,978 POUNDS of ZINC or ZINC COMPOUNDS for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for either ZINC or ZINC COMPOUNDS for reporting year 2020. Please REVIEW your calculations and submit new report for ZINC or ZINC COMPOUNDS for reporting year 2020, if needed.
- Your facility appeared to have received approximately 21,303 POUNDS of 2-Mercaptobenzothiazole for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for 2-Mercaptobenzothiazole for reporting year 2020. Please review your calculations and submit new report for 2-Mercaptobenzothiazole for reporting year 2020, if needed.

- Your facility appeared to have received approximately 127,112 POUNDS of Ethylene glycol for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Ethylene glycol for reporting year 2020. Please review your calculations and submit new report for Ethylene glycol for reporting year 2020, if needed.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=41e6bc7e-394c-4f50-b6f6-2f8c4d3d021a&target=8eae98e6-21e1-4171-95af-fcbb82daeacf>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

.....  
**EPA Contractor Email – OG-2**

**From:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>

**Sent:** Monday, April 11, 2022 10:18 AM

**To:** Abby Burton <Abby.Burton@erg.com>; JDAVIS2@HARSCO.COM  
**Subject:** Reminder: Response Requested: TRI Data Quality Questions

Hello,

This is a reminder that EPA is requesting your response to the following Toxics Release Inventory data quality question. Even if you believe the data in question is correct and no changes are required, please fill out the survey linked below so this issue can be considered resolved.

Thank you for your cooperation.

Sincerely,

Abby Burton

**ERG (EPA Contractor) on behalf of** EPA Region 9

**From:** [abby.burton@erg.com](mailto:abby.burton@erg.com) <[abby.burton@erg.com](mailto:abby.burton@erg.com)>

**Sent:** Friday, March 25, 2022 9:48 AM

**To:** [JDAVIS2@HARSCO.COM](mailto:JDAVIS2@HARSCO.COM); Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>

**Subject:** Toxics Release Inventory (TRI) Data Quality Questions [(21ST CENTURY ENVIRONMENTAL MANAGEMENT OF NEVADA LLC) (TRIFID: 89408CNTRY2095N)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(21ST CENTURY ENVIRONMENTAL MANAGEMENT OF NEVADA LLC) (TRIFID: 89408CNTRY2095N)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Fri Mar 25 09:45:51 EDT 2022

Dear JEFFREY DAVIS:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for 1,1,1-Trichloroethane, 1-Bromopropane, 2-Mercaptobenzothiazole, 4,4'-Methylenedianiline, Cyanide compounds, Dibutyl phthalate, Diethanolamine, Dimethyl phthalate, Ethylene glycol, Formaldehyde, Lithium carbonate, Malathion, Methanol, N-Methyl-2-pyrrolidone, Styrene, Tetrafluoroethylene, Toluene, Xylene (mixed isomers) and Zinc compounds submitted to EPA from your facility: 21ST CENTURY ENVIRONMENTAL MANAGEMENT OF NEVADA LLC) - (TRIFID: 89408CNTRY2095N) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Your facility appeared to have received approximately 42,228 POUNDS of N-Methyl-2-pyrrolidone for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for N-Methyl-2-pyrrolidone for reporting

year 2020. Please review your calculations and submit new report for N-Methyl-2-pyrrolidone for reporting year 2020, if needed.

- It appears your facility has received approximately 70 shipments (sub eManifest IDs) totaling 149,308 pounds of hazardous waste listed containing Cyanide compounds from several TRI facilities for reporting year 2020, but your facility does not appear to have reported for Cyanide compounds for reporting year 2020. Could you please review your calculations and submit a new report for Cyanide compounds for reporting year 2020, if needed.
- It appears your facility has sent approximately 246 shipments (sub eManifest IDs) totaling 1,475,158 pounds of hazardous waste listed containing Toluene to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Toluene for reporting year 2020. Could you please review your calculations and submit a new report for Toluene for reporting year 2020, if needed.
- Your facility appeared to have received approximately 40,171 POUNDS of 1-Bromopropane for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for 1-Bromopropane for reporting year 2020. Please review your calculations and submit new report for 1-Bromopropane for reporting year 2020, if needed.
- Your facility appeared to have received approximately 136,771 POUNDS of Toluene for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Toluene for reporting year 2020. Please review your calculations and submit new report for Toluene for reporting year 2020, if needed.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have received approximately 20 hazardous waste shipments (some e-Manifest #s: 20) totaling 35,816 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.
- Your facility appeared to have received approximately 22,351 POUNDS of 4,4'-Methylenedianiline for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for 4,4'-Methylenedianiline for reporting year 2020. Please review your calculations and submit new report for 4,4'-Methylenedianiline for reporting year 2020, if needed.
- Your facility appeared to have received approximately 24,911 POUNDS of Tetrafluoroethylene for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Tetrafluoroethylene for reporting year 2020. Please review your calculations and submit new report for Tetrafluoroethylene for reporting year 2020, if needed.
- Your facility appeared to have received approximately 32,279 POUNDS of Lithium carbonate for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Lithium carbonate for reporting year 2020. Please review your calculations and submit new report for Lithium carbonate for reporting year 2020, if needed.
- Your facility appeared to have received approximately 139,540 POUNDS of Xylene (mixed isomers) for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Xylene (mixed isomers) for reporting year 2020. Please review your calculations and submit new report for Xylene (mixed isomers) for reporting year 2020, if needed.
- It appears your facility has sent approximately 81 shipments (sub eManifest IDs) totaling 149,812 pounds of hazardous waste listed containing Cyanide compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Cyanide compounds for reporting year 2020. Could

you please review your calculations and submit a new report for Cyanide compounds for reporting year 2020, if needed.

- Your facility appeared to have received approximately 32,865 POUNDS of Dimethyl phthalate for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Dimethyl phthalate for reporting year 2020. Please review your calculations and submit new report for Dimethyl phthalate for reporting year 2020, if needed.
- Your facility appeared to have received approximately 59,902 POUNDS of Dibutyl phthalate for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Dibutyl phthalate for reporting year 2020. Please review your calculations and submit new report for Dibutyl phthalate for reporting year 2020, if needed.
- Your facility appeared to have received approximately 174,090 POUNDS of Methanol for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Methanol for reporting year 2020. Please review your calculations and submit new report for Methanol for reporting year 2020, if needed.
- It appears your facility has received approximately 66 shipments (sub eManifest IDs) totaling 143,919 pounds of hazardous waste listed containing Malathion from several TRI facilities for reporting year 2020, but your facility does not appear to have reported for Malathion for reporting year 2020. Could you please review your calculations and submit a new report for Malathion for reporting year 2020, if needed.
- Your facility appeared to have received approximately 35,224 POUNDS of Styrene for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Styrene for reporting year 2020. Please review your calculations and submit new report for Styrene for reporting year 2020, if needed.
- Your facility appeared to have received approximately 58,102 POUNDS of 1,1,1-Trichloroethane for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for 1,1,1-Trichloroethane for reporting year 2020. Please review your calculations and submit new report for 1,1,1-Trichloroethane for reporting year 2020, if needed.
- Your facility appeared to have received approximately 68,208 POUNDS of Formaldehyde for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Formaldehyde for reporting year 2020. Please review your calculations and submit new report for Formaldehyde for reporting year 2020, if needed.
- Your facility appeared to have received approximately 19,143 POUNDS of Diethanolamine for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Diethanolamine for reporting year 2020. Please review your calculations and submit new report for Diethanolamine for reporting year 2020, if needed.
- Your facility appeared to have received approximately 15,978 POUNDS of ZINC or ZINC COMPOUNDS for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for either ZINC or ZINC COMPOUNDS for reporting year 2020. Please REVIEW your calculations and submit new report for ZINC or ZINC COMPOUNDS for reporting year 2020, if needed.
- Your facility appeared to have received approximately 21,303 POUNDS of 2-Mercaptobenzothiazole for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for 2-Mercaptobenzothiazole for reporting year 2020. Please review your calculations and submit new report for 2-Mercaptobenzothiazole for reporting year 2020, if needed.
- Your facility appeared to have received approximately 127,112 POUNDS of Ethylene glycol for disposal / treatment, which is over otherwise use threshold amount of 10,000 POUNDS from TRI facilities for reporting year 2020, but your facility did not appear to report for Ethylene glycol for reporting year 2020.

Please review your calculations and submit new report for Ethylene glycol for reporting year 2020, if needed.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=41e6bc7e-394c-4f50-b6f6-2f8c4d3d021a&target=8eae98e6-21e1-4171-95af-fcbb82daeacf>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

**US MARINE CORPS MCB CAMP  
PENDLETON (92055MRNCRPOBOX)  
BLDG 22165 11TH ST, CAMP PENDLETON, CA 92055 (Region 9)**

**EPA Contractor Email – OG-1**

Contractor Email

03/29/2022 09:57am

From: *Abigail Burton*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(US MARINE CORPS MCB CAMP PENDLETON) (TRIFID: 92055MRNCRPOBOX)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To                    | E-Mail Address           |
|----------------------------|--------------------------|
| Self: Abigail Burton       | abby.burton@erg.com      |
| To: CAPTAIN DAVID MANCILLA | DAVID.MANCILLA@USMC.MIL  |
| To: GABE GOODMAN           | GABRIEL.GOODMAN@USMC.MIL |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(US MARINE CORPS MCB CAMP PENDLETON) (TRIFID: 92055MRNCRPOBOX)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 29 13:55:29 UTC 2022

Dear CAPTAIN DAVID MANCILLA and GABE GOODMAN:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: *US MARINE CORPS MCB CAMP PENDLETON - (TRIFID: 92055MRNCRPOBOX)* for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS)

([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 10 hazardous waste shipments (some e-Manifest #s: 10) totaling 39,740 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=ca0b21aa-b758-4bcd-84c6-9b9e21eaf354&target=6ca0fad2-b62a-4324-97c7-3c686c33aea5>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

Contractor Email

04/18/2022 09:26am

From: *Abigail Burton*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To                              | E-Mail Address                   |
|--------------------------------------|----------------------------------|
| Self: Abigail Burton                 | abby.burton@erg.com              |
| Cc: Natalie.baum@woodplc.com         | Natalie.baum@woodplc.com         |
| Cc: mailto:daniel.perrin@woodplc.com | mailto:daniel.perrin@woodplc.com |
| To: CAPTAIN DAVID MANCILLA           | DAVID.MANCILLA@USMC.MIL          |
| To: GABE GOODMAN                     | GABRIEL.GOODMAN@USMC.MIL         |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Region 9

Mon Apr 18 13:25:45 UTC 2022

Dear CAPTAIN DAVID MANCILLA and GABE GOODMAN:

EPA would like to inform you that data quality issues raised for your facility [US MARINE CORPS MCB CAMP PENDLETON (TRIFID: 92055MRNCRPOBOX)] during reporting year 2020 Adhoc Data Quality Checks are resolved for the following:

Reporting Year(s) Chemicals

2020 No chemicals

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Abigail Burton

**ERG (EPA Contractor) on behalf of:**

TRI Data Quality Program

US EPA

Region 9

Email sent on 03/29/2022 01:57pm

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

**Toxics Release Inventory (TRI) Data Quality Questions [(US MARINE CORPS MCB CAMP PENDLETON) (TRIFID: 92055MRNCRPOBOX)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 29 13:55:29 UTC 2022

Dear CAPTAIN DAVID MANCILLA and GABE GOODMAN:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: *US MARINE CORPS MCB CAMP PENDLETON - (TRIFID: 92055MRNCRPOBOX)* for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 10 hazardous waste shipments (some e-Manifest #s: 10) totaling 39,740 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

*Step 1:*

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=ca0b21aa-b758-4bcd-84c6-9b9e21eaf354&target=6ca0fad2-b62a-4324-97c7-3c686c33aea5>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

*Step 2:*

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

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If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

### **EPA Contractor Email – OG-3**

**From:** Abby Burton

**Sent:** Thursday, April 14, 2022 3:38 PM

**To:** GABRIEL.GOODMAN@USMC.MIL; DAVID.MANCILLA@USMC.MIL

**Subject:** Reminder: Response Requested: TRI Data Quality Questions due April 29

Hello,

This is a reminder that EPA is requesting your response to the following Toxics Release Inventory data quality question. Even if you believe the data in question is correct and no changes are required, please fill out the survey linked below so this issue can be considered resolved.

Thank you for your cooperation.

Sincerely,

Abby Burton

**ERG (EPA Contractor) on behalf of** EPA Region 9

**From:** [abby.burton@erg.com](mailto:abby.burton@erg.com) <[abby.burton@erg.com](mailto:abby.burton@erg.com)>

**Sent:** Tuesday, March 29, 2022 10:03 AM

**To:** GABRIEL.GOODMAN@USMC.MIL; DAVID.MANCILLA@USMC.MIL; Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>

**Subject:** Toxics Release Inventory (TRI) Data Quality Questions [(US MARINE CORPS MCB CAMP PENDLETON) (TRIFID: 92055MRNCRPOBOX)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(US MARINE CORPS MCB CAMP PENDLETON) (TRIFID: 92055MRNCRPOBOX)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 29 13:55:29 UTC 2022

Dear CAPTAIN DAVID MANCILLA and GABE GOODMAN:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: *US MARINE CORPS MCB CAMP PENDLETON* - (TRIFID: 92055MRNCRPOBOX) for reporting year(s) 2020 has been identified for follow-up due to the following:**

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<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=ca0b21aa-b758-4bcd-84c6-9b9e21eaf354&target=6ca0fad2-b62a-4324-97c7-3c686c33aea5>

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(<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb).  
<https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

### Facility Response – IC-1

From: Goodman CIV Gabriel S <[gabriel.goodman@usmc.mil](mailto:gabriel.goodman@usmc.mil)>  
Sent: Thursday, April 14, 2022 4:04 PM  
To: Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>; Mancilla Capt David M <[david.mancilla@usmc.mil](mailto:david.mancilla@usmc.mil)>  
Subject: RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Good afternoon Abby,

I just received your message.

The below CDX survey link is not working for me, or any of my contractors who work on this effort...

What is an alternative to resolve the questionnaire?

//gabe

Respectfully,

GABE GOODMAN  
Section Head, Pollution Prevention  
Installation IPM Coordinator  
Environmental Security  
MCIWEST-MCB Camp Pendleton, Ca  
Mobile: (760) 815-8223  
Office: (760) 725-9757  
[gabriel.goodman@usmc.mil](mailto:gabriel.goodman@usmc.mil)

-----Original Message-----

From: Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>

Sent: Thursday, April 14, 2022 12:38 PM

To: Goodman CIV Gabriel S <[gabriel.goodman@usmc.mil](mailto:gabriel.goodman@usmc.mil)>; Mancilla Capt David M <[david.mancilla@usmc.mil](mailto:david.mancilla@usmc.mil)>

Subject: [Non-DoD Source] Reminder: Response Requested: TRI Data Quality Questions due April 29

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Thank you for your cooperation.

Sincerely,

Abby Burton

ERG (EPA Contractor) on behalf of EPA Region 9

From: [abby.burton@erg.com](mailto:abby.burton@erg.com) <[abby.burton@erg.com](mailto:abby.burton@erg.com)>

Sent: Tuesday, March 29, 2022 10:03 AM

To: [GABRIEL.GOODMAN@USMC.MIL](mailto:GABRIEL.GOODMAN@USMC.MIL); [DAVID.MANCILLA@USMC.MIL](mailto:DAVID.MANCILLA@USMC.MIL); Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(US MARINE CORPS MCB CAMP PENDLETON) (TRIFID: 92055MRNCRPOBOX)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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Tue Mar 29 13:55:29 UTC 2022

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necessary.

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If you are no longer the technical contact for TRI reporting, please forward

this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com) <<mailto:abby.burton@erg.com>> .

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

#### **EPA Contractor Email – OG-4**

From: Abby Burton

Sent: Friday, April 15, 2022 3:16 PM

To: Goodman CIV Gabriel S <[gabriel.goodman@usmc.mil](mailto:gabriel.goodman@usmc.mil)>; Mancilla Capt David M <[david.mancilla@usmc.mil](mailto:david.mancilla@usmc.mil)>

Subject: RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Hi Gabe,

We do sometimes encounter unexpected errors that I suspect might be related to DoD IT security. We can work around - if you can respond by email, I'll get your answers recorded in the EPA system.

Here are the survey questions:

Reporting Year 2020: Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA)

immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS)

([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to

the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 10 hazardous waste shipments (some e-Manifest #s: 10) totaling 39,740 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

-Response [select one]: New Submission; Withdrawal; Revision; No change; Other -Reason for response [enter text, up to 2,000 characters]:

Your name and contact information:

-Name

-Email

-Title

-Phone Number

-Contractor Company Name [if applicable]

Best,

Abby

Abby Burton | ERG (EPA Contractor) | 908.251.7161 (mobile) | she/her/hers

-----Original Message-----

From: Goodman CIV Gabriel S <[gabriel.goodman@usmc.mil](mailto:gabriel.goodman@usmc.mil)>

Sent: Thursday, April 14, 2022 4:04 PM

To: Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>; Mancilla Capt David M <[david.mancilla@usmc.mil](mailto:david.mancilla@usmc.mil)>

Subject: RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

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What is an alternative to resolve the questionnaire?

//gabe

Respectfully,

GABE GOODMAN  
Section Head, Pollution Prevention  
Installation IPM Coordinator  
Environmental Security  
MCIWEST-MCB Camp Pendleton, Ca  
Mobile: (760) 815-8223  
Office: (760) 725-9757  
[gabriel.goodman@usmc.mil](mailto:gabriel.goodman@usmc.mil)

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Thank you for your cooperation.

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Abby Burton

ERG (EPA Contractor) on behalf of EPA Region 9

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Subject: Toxics Release Inventory (TRI) Data Quality Questions [(US MARINE CORPS MCB CAMP PENDLETON) (TRIFID: 92055MRNCRPOBOX)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

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- Due April 29, 2022

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Thank you for your attention to this matter.

Sincerely,

Abigail Burton

### Facility Response – IC-2

**From:** Goodman CIV Gabriel S <[gabriel.goodman@usmc.mil](mailto:gabriel.goodman@usmc.mil)>

**Sent:** Friday, April 15, 2022 5:16 PM

**To:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>; Mancilla Capt David M <[david.mancilla@usmc.mil](mailto:david.mancilla@usmc.mil)>; Natalie Baum <[natalie.baum@woodplc.com](mailto:natalie.baum@woodplc.com)>; Daniel Perrin <[daniel.perrin@woodplc.com](mailto:daniel.perrin@woodplc.com)>

**Subject:** RE: [Non-DoD Source] RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Much appreciated.

Natalie/ Dan:

I know we have specifically discussed this already but can you please respond to Ms. Burton; detailing the release (TRI) vs waste discrepancies...

Thank you.

//gabe

**From:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>

**Date:** Friday, Apr 15, 2022, 15:16

**To:** Goodman CIV Gabriel S <[gabriel.goodman@usmc.mil](mailto:gabriel.goodman@usmc.mil)>, Mancilla Capt David M <[david.mancilla@usmc.mil](mailto:david.mancilla@usmc.mil)>

**Subject:** [Non-DoD Source] RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

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-Response [select one]: New Submission; Withdrawal; Revision; No change; Other

-Reason for response [enter text, up to 2,000 characters]:

Your name and contact information:

-Name

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-Title

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-Contractor Company Name [if applicable]

Best,

Abby

Abby Burton | ERG (EPA Contractor) | 908.251.7161 (mobile) | she/her/hers

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<https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, please complete them and Certify them in your CDX reporting account by April 29, 2022.

Please do not reply directly to this email. This email account is NOT MONITORED. Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com) <<mailto:abby.burton@erg.com>> .

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

### Facility Response – IC-3

**From:** Baum, Natalie <[natalie.baum@woodplc.com](mailto:natalie.baum@woodplc.com)>

**Sent:** Monday, April 18, 2022 9:14 AM

**To:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>

**Cc:** Goodman CIV Gabriel S <[gabriel.goodman@usmc.mil](mailto:gabriel.goodman@usmc.mil)>; Perrin, Daniel <[daniel.perrin@woodplc.com](mailto:daniel.perrin@woodplc.com)>; Mancilla Capt David M <[david.mancilla@usmc.mil](mailto:david.mancilla@usmc.mil)>

**Subject:** RE: [Non-DoD Source] RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Abby-

Response to the questionnaire for US MARINE CORPS MCB CAMP PENDLETON - (TRIFID: 92055MRNCRPOBOX).

Response-No Change.

Reason-In 2020 US MARINE CORPS MCB CAMP PENDLETON removed and disposed inventory of PFAS containing AFFF from several locations including the Fire Department. The disposed AFFF was not from usage of the material, but only the removal of the product in an effort to decrease the quantity of PFAS stored on base. Data used to support EPCRA Section 313 TRI threshold calculations show there were no reportable uses of PFAS containing AFFF in 2020. There were 136 gallons of AFFF in accidental releases and 390 gallons of AFFF added to top off aircraft rescue trucks, both of Phos-Chek 3%. The SDS for Phos-Chek does not list PFAS chemicals in the chemical formulation, therefore no TRI listed PFAS chemicals exceeded a threshold quantity in RY2020.

Contact Info: Natalie Baum

[Natalie.baum@woodplc.com](mailto:Natalie.baum@woodplc.com)

Senior Engineer II

(513) 207-1899

Wood Environment and Infrastructure (on behalf of MCB CAMP PENDLETON)

**From:** Goodman CIV Gabriel S <[gabriel.goodman@usmc.mil](mailto:gabriel.goodman@usmc.mil)>

**Sent:** Friday, April 15, 2022 5:16 PM

**To:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>; Mancilla Capt David M <[david.mancilla@usmc.mil](mailto:david.mancilla@usmc.mil)>; Baum, Natalie

<[natalie.baum@woodplc.com](mailto:natalie.baum@woodplc.com)>; Perrin, Daniel <[daniel.perrin@woodplc.com](mailto:daniel.perrin@woodplc.com)>

**Subject:** RE: [Non-DoD Source] RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Much appreciated.

Natalie/ Dan:

I know we have specifically discussed this already but can you please respond to Ms. Burton; detailing the release (TRI) vs waste discrepancies...

Thank you.

//gabe

**From:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>

**Date:** Friday, Apr 15, 2022, 15:16

**To:** Goodman CIV Gabriel S <[gabriel.goodman@usmc.mil](mailto:gabriel.goodman@usmc.mil)>, Mancilla Capt David M <[david.mancilla@usmc.mil](mailto:david.mancilla@usmc.mil)>

**Subject:** [Non-DoD Source] RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Hi Gabe,

We do sometimes encounter unexpected errors that I suspect might be related to DoD IT security. We can work around - if you can respond by email, I'll get your answers recorded in the EPA system.

Here are the survey questions:

Reporting Year 2020: Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 10 hazardous waste shipments (some e-Manifest #s: 10) totaling 39,740 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

-Response [select one]: New Submission; Withdrawal; Revision; No change; Other

-Reason for response [enter text, up to 2,000 characters]:

Your name and contact information:

-Name

-Email

-Title

-Phone Number

-Contractor Company Name [if applicable]

Best,  
Abby

Abby Burton | ERG (EPA Contractor) | 908.251.7161 (mobile) | she/her/hers

-----Original Message-----

From: Goodman CIV Gabriel S <[gabriel.goodman@usmc.mil](mailto:gabriel.goodman@usmc.mil)>

Sent: Thursday, April 14, 2022 4:04 PM

To: Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>; Mancilla Capt David M <[david.mancilla@usmc.mil](mailto:david.mancilla@usmc.mil)>  
Subject: RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Good afternoon Abby,

I just received your message.

The below CDX survey link is not working for me, or any of my contractors who work on this effort...

What is an alternative to resolve the questionnaire?  
//gabe

Respectfully,

GABE GOODMAN  
Section Head, Pollution Prevention  
Installation IPM Coordinator  
Environmental Security  
MCIWEST-MCB Camp Pendleton, Ca  
Mobile: (760) 815-8223  
Office: (760) 725-9757  
[gabriel.goodman@usmc.mil](mailto:gabriel.goodman@usmc.mil)

-----Original Message-----

From: Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>  
Sent: Thursday, April 14, 2022 12:38 PM  
To: Goodman CIV Gabriel S <[gabriel.goodman@usmc.mil](mailto:gabriel.goodman@usmc.mil)>; Mancilla Capt David M <[david.mancilla@usmc.mil](mailto:david.mancilla@usmc.mil)>  
Subject: [Non-DoD Source] Reminder: Response Requested: TRI Data Quality Questions due April 29

Hello,

This is a reminder that EPA is requesting your response to the following Toxics Release Inventory data quality question. Even if you believe the data in question is correct and no changes are required, please fill out the survey linked below so this issue can be considered resolved.

Thank you for your cooperation.

Sincerely,

Abby Burton

ERG (EPA Contractor) on behalf of EPA Region 9

From: [abby.burton@erg.com](mailto:abby.burton@erg.com) <[abby.burton@erg.com](mailto:abby.burton@erg.com)>  
Sent: Tuesday, March 29, 2022 10:03 AM  
To: [GABRIEL.GOODMAN@USMC.MIL](mailto:GABRIEL.GOODMAN@USMC.MIL); [DAVID.MANCILLA@USMC.MIL](mailto:DAVID.MANCILLA@USMC.MIL); Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>  
Subject: Toxics Release Inventory (TRI) Data Quality Questions [(US MARINE

CORPS MCB CAMP PENDLETON) (TRIFID: 92055MRNCRPOBOX)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Toxics Release Inventory (TRI) Data Quality Questions [(US MARINE CORPS MCB CAMP PENDLETON) (TRIFID: 92055MRNCRPOBOX)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

Tue Mar 29 13:55:29 UTC 2022

Dear CAPTAIN DAVID MANCILLA and GABE GOODMAN:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

The Form R for NO\_VALUE submitted to EPA from your facility: US MARINE CORPS MCB CAMP PENDLETON - (TRIFID: 92055MRNCRPOBOX) for reporting year(s) 2020 has been identified for follow-up due to the following:

Reporting Year 2020

\* Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pf\\_as\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pf_as_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 10 hazardous waste shipments (some e-Manifest #: 10) totaling 39,740 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

How do I respond to this inquiry? (Step 1 is always required)

*Step 1:*

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=ca0b21aa-b758-4bcd-84c6-9b9e21eaf354&target=6ca0fad2-b62a-4324-97c7-3c686c33aea5>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

Step 2:

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, please complete them and Certify them in your CDX reporting account by April 29, 2022.

Please do not reply directly to this email. This email account is NOT MONITORED. Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com) <<mailto:abby.burton@erg.com>> .

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

### **EPA Contractor Email – OG-5**

**From:** Abby Burton

**Sent:** Monday, April 18, 2022 9:29 AM

**To:** Baum, Natalie <[natalie.baum@woodplc.com](mailto:natalie.baum@woodplc.com)>

**Cc:** Goodman CIV Gabriel S <[gabriel.goodman@usmc.mil](mailto:gabriel.goodman@usmc.mil)>; Perrin, Daniel <[daniel.perrin@woodplc.com](mailto:daniel.perrin@woodplc.com)>; Mancilla Capt David M <[david.mancilla@usmc.mil](mailto:david.mancilla@usmc.mil)>

**Subject:** RE: [Non-DoD Source] RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Thank you. I have recorded your response. You should all be receiving an email shortly notifying you that this question is now considered resolved.

Please let me know if you don't get that email and need a copy for your records. I know we sometimes have trouble with our automated email system getting through to .mil email addresses.

Abby Burton | **ERG (EPA Contractor)** | 908.251.7161 (mobile) | she/her/hers

## Facility Response – IC-4

**From:** Baum, Natalie <[natalie.baum@woodplc.com](mailto:natalie.baum@woodplc.com)>

**Sent:** Monday, April 18, 2022 9:14 AM

**To:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>

**Cc:** Goodman CIV Gabriel S <[gabriel.goodman@usmc.mil](mailto:gabriel.goodman@usmc.mil)>; Perrin, Daniel <[daniel.perrin@woodplc.com](mailto:daniel.perrin@woodplc.com)>; Mancilla Capt David M <[david.mancilla@usmc.mil](mailto:david.mancilla@usmc.mil)>

**Subject:** RE: [Non-DoD Source] RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Abby-

Response to the questionnaire for US MARINE CORPS MCB CAMP PENDLETON - (TRIFID: 92055MRNCRPOBOX).

Response-No Change.

Reason-In 2020 US MARINE CORPS MCB CAMP PENDLETON removed and disposed inventory of PFAS containing AFFF from several locations including the Fire Department. The disposed AFFF was not from usage of the material, but only the removal of the product in an effort to decrease the quantity of PFAS stored on base. Data used to support EPCRA Section 313 TRI threshold calculations show there were no reportable uses of PFAS containing AFFF in 2020. There were 136 gallons of AFFF in accidental releases and 390 gallons of AFFF added to top off aircraft rescue trucks, both of Phos-Chek 3%. The SDS for Phos-Chek does not list PFAS chemicals in the chemical formulation, therefore no TRI listed PFAS chemicals exceeded a threshold quantity in RY2020.

Contact Info: Natalie Baum

[Natalie.baum@woodplc.com](mailto:Natalie.baum@woodplc.com)

Senior Engineer II

(513) 207-1899

Wood Environment and Infrastructure (on behalf of MCB CAMP PENDLETON)

**From:** Goodman CIV Gabriel S <[gabriel.goodman@usmc.mil](mailto:gabriel.goodman@usmc.mil)>

**Sent:** Friday, April 15, 2022 5:16 PM

**To:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>; Mancilla Capt David M <[david.mancilla@usmc.mil](mailto:david.mancilla@usmc.mil)>; Baum, Natalie <[natalie.baum@woodplc.com](mailto:natalie.baum@woodplc.com)>; Perrin, Daniel <[daniel.perrin@woodplc.com](mailto:daniel.perrin@woodplc.com)>

**Subject:** RE: [Non-DoD Source] RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Much appreciated.

Natalie/ Dan:

I know we have specifically discussed this already but can you please respond to Ms. Burton; detailing the release (TRI) vs waste discrepancies...

Thank you.

//gabe

**From:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>

**Date:** Friday, Apr 15, 2022, 15:16

**To:** Goodman CIV Gabriel S <[gabriel.goodman@usmc.mil](mailto:gabriel.goodman@usmc.mil)>, Mancilla Capt David M <[david.mancilla@usmc.mil](mailto:david.mancilla@usmc.mil)>

**Subject:** [Non-DoD Source] RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Hi Gabe,

We do sometimes encounter unexpected errors that I suspect might be related to DoD IT security. We can work around - if you can respond by email, I'll get your answers recorded in the EPA system.

Here are the survey questions:

Reporting Year 2020: Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 10 hazardous waste shipments (some e-Manifest #s: 10) totaling 39,740 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

-Response [select one]: New Submission; Withdrawal; Revision; No change; Other

-Reason for response [enter text, up to 2,000 characters]:

Your name and contact information:

-Name

-Email

-Title

-Phone Number

-Contractor Company Name [if applicable]

Best,

Abby

Abby Burton | ERG (EPA Contractor) | 908.251.7161 (mobile) | she/her/hers

-----Original Message-----

From: Goodman CIV Gabriel S <[gabriel.goodman@usmc.mil](mailto:gabriel.goodman@usmc.mil)>

Sent: Thursday, April 14, 2022 4:04 PM

To: Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>; Mancilla Capt David M <[david.mancilla@usmc.mil](mailto:david.mancilla@usmc.mil)>

Subject: RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Good afternoon Abby,

I just received your message.

The below CDX survey link is not working for me, or any of my contractors who work on this effort...

What is an alternative to resolve the questionnaire?

//gabe

Respectfully,

GABE GOODMAN  
Section Head, Pollution Prevention  
Installation IPM Coordinator  
Environmental Security  
MCIWEST-MCB Camp Pendleton, Ca  
Mobile: (760) 815-8223  
Office: (760) 725-9757  
[gabriel.goodman@usmc.mil](mailto:gabriel.goodman@usmc.mil)

-----Original Message-----

From: Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>  
Sent: Thursday, April 14, 2022 12:38 PM  
To: Goodman CIV Gabriel S <[gabriel.goodman@usmc.mil](mailto:gabriel.goodman@usmc.mil)>; Mancilla Capt David M <[david.mancilla@usmc.mil](mailto:david.mancilla@usmc.mil)>  
Subject: [Non-DoD Source] Reminder: Response Requested: TRI Data Quality Questions due April 29

Hello,

This is a reminder that EPA is requesting your response to the following Toxics Release Inventory data quality question. Even if you believe the data in question is correct and no changes are required, please fill out the survey linked below so this issue can be considered resolved.

Thank you for your cooperation.

Sincerely,

Abby Burton

ERG (EPA Contractor) on behalf of EPA Region 9

From: [abby.burton@erg.com](mailto:abby.burton@erg.com) <[abby.burton@erg.com](mailto:abby.burton@erg.com)>  
Sent: Tuesday, March 29, 2022 10:03 AM  
To: [GABRIEL.GOODMAN@USMC.MIL](mailto:GABRIEL.GOODMAN@USMC.MIL); [DAVID.MANCILLA@USMC.MIL](mailto:DAVID.MANCILLA@USMC.MIL); Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>  
Subject: Toxics Release Inventory (TRI) Data Quality Questions [(US MARINE CORPS MCB CAMP PENDLETON) (TRIFID: 92055MRNCRPOBOX)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Toxics Release Inventory (TRI) Data Quality Questions [(US MARINE CORPS MCB CAMP PENDLETON) (TRIFID: 92055MRNCRPOBOX)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

Tue Mar 29 13:55:29 UTC 2022

Dear CAPTAIN DAVID MANCILLA and GABE GOODMAN:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

The Form R for NO\_VALUE submitted to EPA from your facility: US MARINE CORPS MCB CAMP PENDLETON - (TRIFID: 92055MRNCRPOBOX) for reporting year(s) 2020 has been identified for follow-up due to the following:

Reporting Year 2020

\* Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pf\\_as\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pf_as_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 10 hazardous waste shipments (some e-Manifest #s: 10) totaling 39,740 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

How do I respond to this inquiry? (Step 1 is always required)

*Step 1:*

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=ca0b21aa-b758-4bcd-84c6-9b9e21eaf354&target=6ca0fad2-b62a-4324-97c7-3c686c33aea5>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

*Step 2:*

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

RE Non-DoD Source RE Reminder Response Requested TRI Data Quality Questions due April 29.msg

**US NAVAL SUBMARINE BASE SAN DIEGO (92106SNVYN140SY)  
140 SYLVESTER RD, SAN DIEGO, CA 92106 (Region 9)**

**EPA Contractor Email – OG-1**

Contractor Email

03/29/2022 09:58am

From: *Abigail Burton*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(US NAVAL SUBMARINE BASE SAN DIEGO) (TRIFID: 92106SNVYN140SY)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To                   | E-Mail Address                |
|---------------------------|-------------------------------|
| Self: Abigail Burton      | abby.burton@erg.com           |
| To: SHARON STEPHENSONPINO | SHARON.STEPHENSONPIN@NAVY.MIL |
| To: CHRISTINA GRAULAU     | CHRISTINA.GRAULAU@NAVY.MIL    |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(US NAVAL SUBMARINE BASE SAN DIEGO) (TRIFID: 92106SNVYN140SY)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 29 13:57:23 UTC 2022

Dear CHRISTINA GRAULAU and SHARON STEPHENSONPINO:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: *US NAVAL SUBMARINE BASE SAN DIEGO - (TRIFID: 92106SNVYN140SY)* for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI),

and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 2 hazardous waste shipments (some e-Manifest #s: 2) totaling 12,026 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=6a49a0de-5105-4e35-9d02-64dd14cde3bb&target=b9bdda9a-2775-4111-ba47-1da6ec3a5b64>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

**From:** Abby Burton

**Sent:** Thursday, April 14, 2022 3:39 PM

**To:** SHARON.STEPHENSONPIN@NAVY.MIL; CHRISTINA.GRAULAU@NAVY.MIL

**Subject:** Reminder: Response Requested: TRI Data Quality Questions due April 29

Hello,

This is a reminder that EPA is requesting your response to the following Toxics Release Inventory data quality question. Even if you believe the data in question is correct and no changes are required, please fill out the survey linked below so this issue can be considered resolved.

Thank you for your cooperation.

Sincerely,

Abby Burton

**ERG (EPA Contractor) on behalf of** EPA Region 9

**From:** abby.burton@erg.com <abby.burton@erg.com>

**Sent:** Tuesday, March 29, 2022 10:03 AM

**To:** SHARON.STEPHENSONPIN@NAVY.MIL; Abby Burton <Abby.Burton@erg.com>;  
CHRISTINA.GRAULAU@NAVY.MIL

**Subject:** Toxics Release Inventory (TRI) Data Quality Questions [(US NAVAL SUBMARINE BASE SAN DIEGO) (TRIFID: 92106SNVYN140SY)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(US NAVAL SUBMARINE BASE SAN DIEGO) (TRIFID: 92106SNVYN140SY)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 29 13:57:23 UTC 2022

Dear CHRISTINA GRAULAU and SHARON STEPHENSONPINO:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: US NAVAL SUBMARINE BASE SAN DIEGO - (TRIFID: 92106SNVYN140SY) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 2 hazardous waste shipments (some e-Manifest #: 2) totaling 12,026 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=6a49a0de-5105-4e35-9d02-64dd14cde3bb&target=b9bdda9a-2775-4111-ba47-1da6ec3a5b64>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

Contractor Email

04/25/2022 10:47am

From: *Abigail Burton*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To                   | E-Mail Address                |
|---------------------------|-------------------------------|
| Self: Abigail Burton      | abby.burton@erg.com           |
| To: SHARON STEPHENSONPINO | SHARON.STEPHENSONPIN@NAVY.MIL |
| To: CHRISTINA GRAULAU     | CHRISTINA.GRAULAU@NAVY.MIL    |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Region 9

Mon Apr 25 14:47:02 UTC 2022

Dear CHRISTINA GRAULAU and SHARON STEPHENSONPINO:

EPA would like to inform you that data quality issues raised for your facility [US NAVAL SUBMARINE BASE SAN DIEGO (TRIFID: 92106SNVYN140SY)] during reporting year 2020 Adhoc Data Quality Checks are resolved for the following:

Reporting Year(s) Chemicals

2020 No chemicals

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Abigail Burton

***ERG (EPA Contractor) on behalf of***

TRI Data Quality Program

US EPA

Region 9

**Email sent on 03/29/2022 01:58pm**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

**Toxics Release Inventory (TRI) Data Quality Questions [(US NAVAL SUBMARINE BASE SAN DIEGO) (TRIFID: 92106SNVYN140SY)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 29 13:57:23 UTC 2022

Dear CHRISTINA GRAULAU and SHARON STEPHENSONPINO:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: US NAVAL SUBMARINE BASE SAN DIEGO - (TRIFID: 92106SNVYN140SY) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 2 hazardous waste shipments (some e-Manifest #s: 2) totaling 12,026 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=6a49a0de-5105-4e35-9d02-64dd14cde3bb&target=b9bdda9a-2775-4111-ba47-1da6ec3a5b64>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve

access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022.**

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If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

## Facility Response – IC-1

## Status Update

04/25/2022

*Abigail Burton*

Abigail Burton updated the Error Status from "Unresolved" to "Resolved" with Facility Response Code "BRT - Below chemical activity (manufacturing, processing, otherwise use) reporting threshold." for Error Code PFAS-NOT-F and reporting year 2020. No TRI-reportable PFAS identified as such on AFFF SDSs; Navy assumes 25 ppb for recent AFFF; therefore, facility was below threshold.

**U.S. NAVAL AIR STATION NORTH ISLAND (92135SNVYNSTAFF)  
MC CAIN BLVD, SAN DIEGO, CA 92135 (Region 9)**

**EPA Contractor Email – OG-1**

Contractor Email

03/29/2022 09:50am

From: *Abigail Burton*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(U.S. NAVAL AIR STATION NORTH ISLAND) (TRIFID: 92135SNVYNSTAFF)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To               | E-Mail Address                |
|-----------------------|-------------------------------|
| Self: Abigail Burton  | abby.burton@erg.com           |
| To: KEVIN DIXON       | KEVIN.B.DIXON.CIV@US.NAVY.MIL |
| To: CHRISTINA GRAULAU | CHRISTINA.GRAULAU@NAVY.MIL    |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(U.S. NAVAL AIR STATION NORTH ISLAND) (TRIFID: 92135SNVYNSTAFF)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 29 13:50:01 UTC 2022

Dear KEVIN DIXON and CHRISTINA GRAULAU:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Lead compounds submitted to EPA from your facility: U.S. NAVAL AIR STATION NORTH ISLAND) - (TRIFID: 92135SNVYNSTAFF) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- It appears your facility has received approximately 11 shipments (sub e-Manifest IDs) totaling 45,425 pounds of hazardous waste listed containing Lead / Lead compounds from several TRI facilities for reporting year 2020, but your facility does not appear to have reported for Lead / Lead compounds for

reporting year 2020. Could you please review your calculations and submit a new report for Lead / Lead compounds for reporting year 2020, if needed.

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 10 hazardous waste shipments (some e-Manifest #: 10) totaling 163,766 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=8987ac46-6f6b-46d4-928d-0063ecb0ac26&target=db9d7eae-ca02-4f28-846f-5ea781896749>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022.**

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If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

## EPA Contractor Email – OG-2

**From:** Abby Burton

**Sent:** Thursday, April 14, 2022 3:05 PM

**To:** KEVIN.B.DIXON.CIV@US.NAVY.MIL; CHRISTINA.GRAULAU@NAVY.MIL

**Subject:** Reminder: Response Requested: TRI Data Quality Questions due April 29

Hello,

This is a reminder that EPA is requesting your response to the following Toxics Release Inventory data quality question. Even if you believe the data in question is correct and no changes are required, please fill out the survey linked below so this issue can be considered resolved.

Thank you for your cooperation.

Sincerely,

Abby Burton

**ERG (EPA Contractor) on behalf of** EPA Region 9

**From:** abby.burton@erg.com <abby.burton@erg.com>

**Sent:** Tuesday, March 29, 2022 9:51 AM

**To:** Abby Burton <Abby.Burton@erg.com>; KEVIN.B.DIXON.CIV@US.NAVY.MIL; CHRISTINA.GRAULAU@NAVY.MIL

**Subject:** Toxics Release Inventory (TRI) Data Quality Questions [(U.S. NAVAL AIR STATION NORTH ISLAND) (TRIFID: 92135SNVYNSTAFF)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

**Toxics Release Inventory (TRI) Data Quality Questions [(U.S. NAVAL AIR STATION NORTH ISLAND) (TRIFID: 92135SNVYNSTAFF)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 29 13:50:01 UTC 2022

Dear KEVIN DIXON and CHRISTINA GRAULAU:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Lead compounds submitted to EPA from your facility: U.S. NAVAL AIR STATION NORTH ISLAND) - (TRIFID: 92135SNVYNSTAFF) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- It appears your facility has received approximately 11 shipments (sub e-Manifest IDs) totaling 45,425 pounds of hazardous waste listed containing Lead / Lead compounds from several TRI facilities for reporting year 2020, but your facility does not appear to have reported for Lead / Lead compounds for reporting year 2020. Could you please review your calculations and submit a new report for Lead / Lead compounds for reporting year 2020, if needed.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 10 hazardous waste shipments (some e-Manifest #: 10) totaling 163,766 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=8987ac46-6f6b-46d4-928d-0063ecb0ac26&target=db9d7eae-ca02-4f28-846f-5ea781896749>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022.**

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If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

## EPA Contractor Email – OG-3

Contractor Email

04/25/2022 10:32am

From: *Abigail Burton*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To               | E-Mail Address                |
|-----------------------|-------------------------------|
| Self: Abigail Burton  | abby.burton@erg.com           |
| To: KEVIN DIXON       | KEVIN.B.DIXON.CIV@US.NAVY.MIL |
| To: CHRISTINA GRAULAU | CHRISTINA.GRAULAU@NAVY.MIL    |

Attachments:

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 9

Mon Apr 25 14:32:24 UTC 2022

Dear KEVIN DIXON and CHRISTINA GRAULAU:

EPA would like to inform you that data quality issues raised for your facility [U.S. NAVAL AIR STATION NORTH ISLAND (TRIFID: 92135SNVYNSTAFF)] during reporting year 2020 Adhoc Data Quality Checks are resolved for the following:

#### Reporting Year(s) Chemicals

2020 Lead compounds

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Abigail Burton

***ERG (EPA Contractor) on behalf of***

TRI Data Quality Program

US EPA

Region 9

Email sent on 03/29/2022 01:50pm

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

**Toxics Release Inventory (TRI) Data Quality Questions [(U.S. NAVAL AIR STATION NORTH ISLAND) (TRIFID: 92135SNVYNSTAFF)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 29 13:50:01 UTC 2022

Dear KEVIN DIXON and CHRISTINA GRAULAU:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Lead compounds submitted to EPA from your facility: U.S. NAVAL AIR STATION NORTH ISLAND) - (TRIFID: 92135SNVYNSTAFF) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- It appears your facility has received approximately 11 shipments (sub e-Manifest IDs) totaling 45,425 pounds of hazardous waste listed containing Lead / Lead compounds from several TRI facilities for reporting year 2020, but your facility does not appear to have reported for Lead / Lead compounds for reporting year 2020. Could you please review your calculations and submit a new report for Lead / Lead compounds for reporting year 2020, if needed.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 10 hazardous waste shipments (some e-Manifest #: 10) totaling 163,766 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

*Step 1:*

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=8987ac46-6f6b-46d4-928d-0063ecb0ac26&target=db9d7eae-ca02-4f28-846f-5ea781896749>

*Step 2:*

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022.**

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If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

## Facility Response – IC-1

## Status Update

04/25/2022

*Abigail Burton*

Abigail Burton updated the Error Status from "Unresolved" to "Resolved" with Facility Response Code "BRT - Below chemical activity (manufacturing, processing, otherwise use) reporting threshold." for Error Code EMAN-TNO, reporting year 2020, and chemical Lead compounds. Per phone conversation with facility and supporting documentation received via email, TRI-reportable PFAS chemicals were used only in < threshold quantities.

.....

**U.S. NAVAL BASE SAN DIEGO (92136SDDSN3455S)  
3455 SENN RD, SAN DIEGO, CA 92136 (Region 9)**

**EPA Contractor Email – OG-1**

Contractor Email

03/29/2022 09:51am

From: *Abigail Burton*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(U.S. NAVAL BASE SAN DIEGO) (TRIFID: 92136SDDSN3455S)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To                | E-Mail Address              |
|------------------------|-----------------------------|
| Self: Abigail Burton   | abby.burton@erg.com         |
| To: KRISHNA M. JACKSON | KRISHNA.M.JACKSON1@NAVY.MIL |
| To: CHRISTINA GRAULAU  | CHRISTINA.GRAULAU@NAVY.MIL  |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(U.S. NAVAL BASE SAN DIEGO) (TRIFID: 92136SDDSN3455S)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 29 13:51:18 UTC 2022

Dear CHRISTINA GRAULAU and KRISHNA M. JACKSON:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: U.S. NAVAL BASE SAN DIEGO) - (TRIFID: 92136SDDSN3455S) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-)

cbi\_pfas\_list\_1\_8\_2021\_final.pdf) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 338 hazardous waste shipments (some e-Manifest #: 338) totaling 11,607,196 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=d3afb6dc-9e4b-4e5d-92e5-33b4e6d64cae&target=1755013e-868b-4577-89b1-cc558dc46f94>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

**EPA Contractor Email – OG-2**

**From:** Abby Burton  
**Sent:** Thursday, April 14, 2022 3:06 PM  
**To:** KRISHNA.M.JACKSON1@NAVY.MIL; CHRISTINA.GRAULAU@NAVY.MIL  
**Subject:** Reminder: Response Requested: TRI Data Quality Questions due April 29

Hello,

This is a reminder that EPA is requesting your response to the following Toxics Release Inventory data quality question. Even if you believe the data in question is correct and no changes are required, please fill out the survey linked below so this issue can be considered resolved.

Thank you for your cooperation.

Sincerely,

Abby Burton

**ERG (EPA Contractor) on behalf of** EPA Region 9

**From:** abby.burton@erg.com <abby.burton@erg.com>  
**Sent:** Tuesday, March 29, 2022 9:52 AM  
**To:** KRISHNA.M.JACKSON1@NAVY.MIL; Abby Burton <Abby.Burton@erg.com>; CHRISTINA.GRAULAU@NAVY.MIL  
**Subject:** Toxics Release Inventory (TRI) Data Quality Questions [(U.S. NAVAL BASE SAN DIEGO) (TRIFID: 92136SDDSN3455S)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(U.S. NAVAL BASE SAN DIEGO) (TRIFID: 92136SDDSN3455S)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 29 13:51:18 UTC 2022

Dear CHRISTINA GRAULAU and KRISHNA M. JACKSON:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: U.S. NAVAL BASE SAN DIEGO) - (TRIFID: 92136SDDSN3455S) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI),

and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 338 hazardous waste shipments (some e-Manifest #: 338) totaling 11,607,196 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=d3afb6dc-9e4b-4e5d-92e5-33b4e6d64cae&target=1755013e-868b-4577-89b1-cc558dc46f94>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

**EPA Contractor Email – OG-3**

Contractor Email

04/25/2022 10:37am

From: *Abigail Burton*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To                | E-Mail Address              |
|------------------------|-----------------------------|
| Self: Abigail Burton   | abby.burton@erg.com         |
| To: KRISHNA M. JACKSON | KRISHNA.M.JACKSON1@NAVY.MIL |
| To: CHRISTINA GRAULAU  | CHRISTINA.GRAULAU@NAVY.MIL  |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Region 9

Mon Apr 25 14:37:38 UTC 2022

Dear CHRISTINA GRAULAU and KRISHNA M. JACKSON:

EPA would like to inform you that data quality issues raised for your facility [U.S. NAVAL BASE SAN DIEGO (TRIFID: 92136SDDSN3455S)] during reporting year 2020 Adhoc Data Quality Checks are resolved for the following:

Reporting Year(s) Chemicals

2020 No chemicals

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Abigail Burton

***ERG (EPA Contractor) on behalf of***

TRI Data Quality Program

US EPA

Region 9

**Email sent on 03/29/2022**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(U.S. NAVAL BASE SAN DIEGO) (TRIFID: 92136SDDSN3455S)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 29 13:51:18 UTC 2022

Dear CHRISTINA GRAULAU and KRISHNA M. JACKSON:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: U.S. NAVAL BASE SAN DIEGO) - (TRIFID: 921365DDSN34555) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 338 hazardous waste shipments (some e-Manifest #s: 338) totaling 11,607,196 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

*Step 1:*

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=d3afb6dc-9e4b-4e5d-92e5-33b4e6d64cae&target=1755013e-868b-4577-89b1-cc558dc46f94>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

*Step 2:*

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

### **Facility Response – IC-1**

Status Update

04/25/2022

*Abigail Burton*

Abigail Burton updated the Error Status from "Unresolved" to "Resolved" with Facility Response Code "BRT - Below chemical activity (manufacturing, processing, otherwise use) reporting threshold." for Error Code PFAS-NOT-F and reporting year 2020. Per phone conversation and supporting documentation received via email, only very small amounts of PFAS were used at the facility (contained at ppb levels in AFFF manufactured after 2016)

.....

**GENERAL DYNAMICS (NASSCO) (92138NTNLSHARBO)  
2798 HARBOR DR, SAN DIEGO, CA 92113 (Region 9)**

**EPA Contractor Email – OG-1**

Contractor Email

03/25/2022 05:48am

From: *Abigail Burton*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(GENERAL DYNAMICS (NASSCO)) (TRIFID: 92138NTNLSHARBO)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To              | E-Mail Address            |
|----------------------|---------------------------|
| Self: Abigail Burton | abby.burton@erg.com       |
| To: SARA GIOBBI      | SGIOBBI@NASSCO.COM        |
| To: DAMON LACASELLA  | DAMONLACASELLA@NASSCO.COM |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(GENERAL DYNAMICS (NASSCO)) (TRIFID: 92138NTNLSHARBO)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Fri Mar 25 09:48:10 EDT 2022

Dear SARA GIOBBI and DAMON LACASELLA:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Toluene submitted to EPA from your facility: *GENERAL DYNAMICS (NASSCO)* - (TRIFID: 92138NTNLSHARBO) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI),

and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 2 hazardous waste shipments (some e-Manifest #: 2) totaling 43,362 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

- It appears your facility has sent approximately 167 shipments (sub eManifest IDs) totaling 423,219 pounds of hazardous waste listed containing Toluene to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Toluene for reporting year 2020. Could you please review your calculations and submit a new report for Toluene for reporting year 2020, if needed.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=4242393b-f5b6-43a9-a20d-ccce94243e90&target=b2a581b9-426a-4a6f-9d7b-01c0d823817c>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

**Facility Response – IC-1**

Subject: Facility Response Form  
From: Sara Giobbi  
Contractor Company Name: NASSCO

(161) 954-48764

Apr 5, 2022 3:27:39 PM  
sgiobbi@nassco.com

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

EMAN-RNO RY 2020

- It appears your facility has sent approximately 167 shipments (sub eManifest IDs) totaling 423,219 pounds of hazardous waste listed containing Toluene to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Toluene for reporting year 2020. Could you please review your calculations and submit a new report for Toluene for reporting year 2020, if needed.

The source of these releases and quantities are listed below:

| Reported Chemical   | Response   | Reporting Year<br>(if applicable) |
|---------------------|--|-----------------------------------|
| Toluene             | No Change  |                                   |
| Reason for Response | Calculations for 2020 were reviewed and it was confirmed that P,M, and OU thresholds for Toluene were not met. |                                   |

PFAS-NOT-F RY 2020

The source of these releases and quantities are listed below:

| Response            | Reporting Year<br>(if applicable)   |
|---------------------|---|
| No Change           |   |
| Reason for Response | Calculations for 2020 were reviewed and it was confirmed that P,M, and OU thresholds for PFAS were not met. |

.....

**US MARINE CORPS AIR STATION  
MIRAMAR (92145SMRNC45249)  
45249 MIRAMAR WAY, SAN DIEGO, CA 92145 (Region 9)**

**EPA Contractor Email – OG-1**

Contractor Email

03/29/2022 09:55am

From: *Abigail Burton*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(US MARINE CORPS AIR STATION MIRAMAR) (TRIFID: 92145SMRNC45249)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To              | E-Mail Address          |
|----------------------|-------------------------|
| Self: Abigail Burton | abby.burton@erg.com     |
| To: COMMSTRAT        | MIRAMAR.COMREL@USMC.MIL |
| To: P. MIKE CORONA   | PAUL.CORONA@USMC.MIL    |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(US MARINE CORPS AIR STATION MIRAMAR) (TRIFID: 92145SMRNC45249)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 29 13:55:00 UTC 2022

Dear P. MIKE CORONA and COMMSTRAT:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Lead compounds submitted to EPA from your facility: *US MARINE CORPS AIR STATION MIRAMAR* - (TRIFID: 92145SMRNC45249) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- It appears your facility has sent approximately 26 shipments (sub e-Manifest IDs) totaling 336,036 pounds of hazardous waste listed containing Lead / Lead compounds to offsite location(s) for reporting year 2020,

but your facility does not appear to have reported for Lead / Lead compounds for reporting year 2020. Could you please review your calculations and submit a new report for Lead / Lead compounds for reporting year 2020, if needed.

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 11 hazardous waste shipments (some e-Manifest #s: 11) totaling 13,586 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=25815e88-1058-4b12-b99d-42cfa38e6b18&target=0dd3e91e-870b-4b70-af4b-4c93125cb51b>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

## Facility Response – IC-1

From: Corona CIV Paul M <paul.corona@usmc.mil>  
Sent: Thursday, April 21, 2022 2:32 PM  
To: Abby Burton <Abby.Burton@erg.com>  
Subject: RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Questionnaire completed. Working on revising facility lead Form R and creating Form R for PFOS.

r/

## EPA Contractor Email – OG-2

-----Original Message-----

From: Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>  
Sent: Thursday, April 14, 2022 12:35 PM  
To: Corona CIV Paul M <[paul.corona@usmc.mil](mailto:paul.corona@usmc.mil)>; [MIRAMAR.COMREL@USMC.MIL](mailto:MIRAMAR.COMREL@USMC.MIL)  
Subject: [Non-DoD Source] Reminder: Response Requested: TRI Data Quality Questions due April 29

Hello,

This is a reminder that EPA is requesting your response to the following Toxics Release Inventory data quality question. Even if you believe the data in question is correct and no changes are required, please fill out the survey linked below so this issue can be considered resolved.

Thank you for your cooperation.

Sincerely,

Abby Burton

ERG (EPA Contractor) on behalf of EPA Region 9

From: [abby.burton@erg.com](mailto:abby.burton@erg.com) <[abby.burton@erg.com](mailto:abby.burton@erg.com)>  
Sent: Tuesday, March 29, 2022 10:01 AM  
To: [PAUL.CORONA@USMC.MIL](mailto:PAUL.CORONA@USMC.MIL); Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>; [MIRAMAR.COMREL@USMC.MIL](mailto:MIRAMAR.COMREL@USMC.MIL)  
Subject: Toxics Release Inventory (TRI) Data Quality Questions [(US MARINE CORPS AIR STATION MIRAMAR) (TRIFID: 92145SMRNC45249)] Form R for Reporting  
Year(s) 2020 - Due April 29, 2022

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Toxics Release Inventory (TRI) Data Quality Questions [(US MARINE CORPS AIR STATION MIRAMAR) (TRIFID: 92145SMRNC45249)] Form R for Reporting Year(s)  
2020 - Due April 29, 2022

Tue Mar 29 13:55:00 UTC 2022

Dear P. MIKE CORONA and COMMSTRAT:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

The Form R for Lead compounds submitted to EPA from your facility: US MARINE CORPS AIR STATION MIRAMAR - (TRIFID: 92145SMRNC45249) for reporting year(s) 2020 has been identified for follow-up due to the following:

- It appears your facility has sent approximately 26 shipments (sub e-Manifest IDs) totaling 336,036 pounds of hazardous waste listed containing Lead / Lead compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Lead / Lead compounds for reporting year 2020. Could you please review your calculations and submit a new report for Lead / Lead compounds for reporting year 2020, if needed.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 11 hazardous waste shipments (some e-Manifest #s: 11) totaling 13,586 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=25815e88-1058-4b12-b99d-42cfa38e6b18&target=0dd3e91e-870b-4b70-af4b-4c93125cb51b>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

### Facility Response – IC-2

Subject: Facility Response Form

Apr 20, 2022 8:39:41 PM

From: P. Mike Corona

(858) 307-1087 paul.corona@usmc.mil

Contractor Company Name: Wood Environment and Infrastructures Solutions

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

EMAN-RNO RY 2020

- It appears your facility has sent approximately 26 shipments (sub eManifest IDs) totaling 336,036 pounds of hazardous waste listed containing Lead / Lead compounds to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Lead / Lead compounds for reporting year 2020. Could you please review your calculations and submit a new report for Lead / Lead compounds for reporting year 2020, if needed.

The source of these releases and quantities are listed below:

| Reported Chemical   | Response   | Reporting Year (if applicable) |
|---------------------|--|--------------------------------|
| Lead compounds      | Revision   | 2020                           |
| Reason for Response | We failed to provide our contractor with manifests for an Installation Restoration CERCLA cleanup site. This was not intentional. These manifests were stored in a different location from our regular hazardous waste shipments. There were far more than 26 shipments. We are working to resolve/calculate and will submit a modification to our facility lead Form R. |                                |

PFAS-NOT-F RY 2020

The source of these releases and quantities are listed below:

| Response            | Reporting Year<br>(if applicable)  |
|---------------------|--|
| New Submission      | 2020   |
| Reason for Response | We have a contractor generate our TRI Reports. We are unsure as to why the PFAS may have been overlooked- potentially because we manifested as AFFF. I have calculated that we shipped 1192.3 lbs of PFAS chemicals as contained in the several thousand pounds of unused AFFF and AFFF contaminated debris. |

.....

**US NAVY NAVAL AIR FACILITY EL CENTRO (9224WSNVLR165TH)  
1605 THIRD ST., BUILDING 504, EL CENTRO, CA 92243 (Region  
9)**

**EPA Contractor Email – OG-1**

Contractor Email

03/29/2022 09:58am

From: *Abigail Burton*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(US NAVY NAVAL AIR FACILITY EL CENTRO) (TRIFID: 9224WSNVLR165TH)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To              | E-Mail Address            |
|----------------------|---------------------------|
| Self: Abigail Burton | abby.burton@erg.com       |
| To: MICHEL REMINGTON | MICHEL.REMINGTON@NAVY.MIL |
| To: JOSE GUTIERREZ   | JOSE.F.GUTIERREZ@NAVY.MIL |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(US NAVY NAVAL AIR FACILITY EL CENTRO) (TRIFID: 9224WSNVLR165TH)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 29 13:58:04 UTC 2022

Dear MICHEL REMINGTON and JOSE GUTIERREZ:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: *US NAVY NAVAL AIR FACILITY EL CENTRO - (TRIFID: 9224WSNVLR165TH)* for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS)

([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 3 hazardous waste shipments (some e-Manifest #s: 3) totaling 49,459 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=86cf09d3-973d-4ab6-8a28-2a00b853b612&target=18beaec2-e2a6-487b-9b54-0743595d9d84>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

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If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

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If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

**EPA Contractor Email – OG-2**

Contractor Email

04/25/2022 10:57am

From: *Abigail Burton*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To              | E-Mail Address            |
|----------------------|---------------------------|
| Self: Abigail Burton | abby.burton@erg.com       |
| To: MICHEL REMINGTON | MICHEL.REMINGTON@NAVY.MIL |
| To: JOSE GUTIERREZ   | JOSE.F.GUTIERREZ@NAVY.MIL |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Region 9

Mon Apr 25 14:57:07 UTC 2022

Dear MICHEL REMINGTON and JOSE GUTIERREZ:

EPA would like to inform you that data quality issues raised for your facility [US NAVY NAVAL AIR FACILITY EL CENTRO (TRIFID: 9224WSNVLR165TH)] during reporting year 2020 Adhoc Data Quality Checks are resolved for the following:

Reporting Year(s) Chemicals

2020 No chemicals

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Abigail Burton

***ERG (EPA Contractor) on behalf of***

TRI Data Quality Program

US EPA

Region 9

**Email sent on 03/29/2022 01:58pm**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(US NAVY NAVAL AIR FACILITY EL CENTRO) (TRIFID: 9224WSNVLR165TH)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 29 13:58:04 UTC 2022

Dear MICHEL REMINGTON and JOSE GUTIERREZ:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: US NAVY NAVAL AIR FACILITY EL CENTRO - (TRIFID: 9224WSNVLR165TH) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 3 hazardous waste shipments (some e-Manifest #: 3) totaling 49,459 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

*Step 1:*

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=86cf09d3-973d-4ab6-8a28-2a00b853b612&target=18beaec2-e2a6-487b-9b54-0743595d9d84>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

*Step 2:*

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MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

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If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

### **EPA Contractor Email – OG-3**

**From:** Abby Burton

**Sent:** Thursday, April 14, 2022 3:40 PM

**To:** MICHEL.REMINGTON@NAVY.MIL; JOSE.F.GUTIERREZ@NAVY.MIL

**Subject:** Reminder: Response Requested: TRI Data Quality Questions due April 29

Hello,

This is a reminder that EPA is requesting your response to the following Toxics Release Inventory data quality question. Even if you believe the data in question is correct and no changes are required, please fill out the survey linked below so this issue can be considered resolved.

Thank you for your cooperation.

Sincerely,

Abby Burton

**ERG (EPA Contractor) on behalf of** EPA Region 9

**From:** [abby.burton@erg.com](mailto:abby.burton@erg.com) <[abby.burton@erg.com](mailto:abby.burton@erg.com)>

**Sent:** Tuesday, March 29, 2022 10:04 AM

**To:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>; MICHEL.REMINGTON@NAVY.MIL; JOSE.F.GUTIERREZ@NAVY.MIL

**Subject:** Toxics Release Inventory (TRI) Data Quality Questions [(US NAVY NAVAL AIR FACILITY EL CENTRO) (TRIFID: 9224WSNVLR165TH)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(US NAVY NAVAL AIR FACILITY EL CENTRO) (TRIFID: 9224WSNVLR165TH)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 29 13:58:04 UTC 2022

Dear MICHEL REMINGTON and JOSE GUTIERREZ:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: US NAVY NAVAL AIR FACILITY EL CENTRO - (TRIFID: 9224WSNVLR165TH) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 3 hazardous waste shipments (some e-Manifest #: 3) totaling 49,459 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

*Step 1:*

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=86cf09d3-973d-4ab6-8a28-2a00b853b612&target=18beaec2-e2a6-487b-9b54-0743595d9d84>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

*Step 2:*

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<https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

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Thank you for your attention to this matter.

Sincerely,

Abigail Burton

### **Facility Response – IC-1**

Status Update

04/25/2022

*Abigail Burton*

Abigail Burton updated the Error Status from "Unresolved" to "Resolved" with Facility Response Code "BRT - Below chemical activity (manufacturing, processing, otherwise use) reporting threshold." for Error Code PFAS-NOT-F and reporting year 2020. Per data provided by Christina Graulau, only small amounts of PFAS were used in AFFF.

.....

**U.S. NAVY NBVC NAVAL AIR STATION POINT  
MUGU (93042SNVYN311MA)  
311 MAIN RD SUITE #1, POINT MUGU, CA 93042 (Region 9)**

**EPA Contractor Email – OG-1**

Contractor Email

03/29/2022 09:52am

From: *Abigail Burton*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(U.S. NAVY NBVC NAVAL AIR STATION POINT MUGU) (TRIFID: 93042SNVYN311MA)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To              | E-Mail Address          |
|----------------------|-------------------------|
| Self: Abigail Burton | abby.burton@erg.com     |
| To: THERESA MILLER   | THERESA.MILLER@NAVY.MIL |
| To: KEITH CRITORIA   | KEITH.CRITORIA@NAVY.MIL |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(U.S. NAVY NBVC NAVAL AIR STATION POINT MUGU) (TRIFID: 93042SNVYN311MA)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 29 13:51:37 UTC 2022

Dear KEITH CRITORIA and THERESA MILLER:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

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**The Form R for NO\_VALUE submitted to EPA from your facility: U.S. NAVY NBVC NAVAL AIR STATION POINT MUGU - (TRIFID: 93042SNVYN311MA) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

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***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=4b2c4fb3-e4c3-44ec-9a3d-ec63ae80b9bd&target=b3ee4c0f-c304-4ddb-ba2c-1649334e08a3>

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Thank you for your attention to this matter.

Sincerely,

Abigail Burton

## EPA Contractor Email – OG-2

**From:** Abby Burton

**Sent:** Thursday, April 14, 2022 3:16 PM

**To:** THERESA.MILLER@NAVY.MIL; KEITH.CRITORIA@NAVY.MIL

**Subject:** Reminder: Response Requested: TRI Data Quality Questions due April 29

Hello,

This is a reminder that EPA is requesting your response to the following Toxics Release Inventory data quality question. Even if you believe the data in question is correct and no changes are required, please fill out the survey linked below so this issue can be considered resolved.

Thank you for your cooperation.

Sincerely,

Abby Burton

**ERG (EPA Contractor) on behalf of** EPA Region 9

**From:** abby.burton@erg.com <abby.burton@erg.com>

**Sent:** Tuesday, March 29, 2022 9:53 AM

**To:** THERESA.MILLER@NAVY.MIL; KEITH.CRITORIA@NAVY.MIL; Abby Burton <Abby.Burton@erg.com>

**Subject:** Toxics Release Inventory (TRI) Data Quality Questions [(U.S. NAVY NBVC NAVAL AIR STATION POINT MUGU) (TRIFID: 93042SNVYN311MA)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

**Toxics Release Inventory (TRI) Data Quality Questions [(U.S. NAVY NBVC NAVAL AIR STATION POINT MUGU) (TRIFID: 93042SNVYN311MA)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 29 13:51:37 UTC 2022

Dear KEITH CRITORIA and THERESA MILLER:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

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**The Form R for NO\_VALUE submitted to EPA from your facility: U.S. NAVY NBVC NAVAL AIR STATION POINT MUGU - (TRIFID: 93042SNVYN311MA) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 1 hazardous waste shipments (some e-Manifest #: 1) totaling 10,890 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, But your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=4b2c4fb3-e4c3-44ec-9a3d-ec63ae80b9bd&target=b3ee4c0f-c304-4ddb-ba2c-1649334e08a3>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

Contractor Email

04/25/2022 10:42am

From: *Abigail Burton*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To              | E-Mail Address          |
|----------------------|-------------------------|
| Self: Abigail Burton | abby.burton@erg.com     |
| To: THERESA MILLER   | THERESA.MILLER@NAVY.MIL |
| To: KEITH CRITORIA   | KEITH.CRITORIA@NAVY.MIL |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Region 9

Mon Apr 25 14:42:11 UTC 2022

Dear KEITH CRITORIA and THERESA MILLER:

EPA would like to inform you that data quality issues raised for your facility [U.S. NAVY NBVC NAVAL AIR STATION POINT MUGU (TRIFID: 93042SNVYN311MA)] during reporting year 2020 Adhoc Data Quality Checks are resolved for the following:

Reporting Year(s) Chemicals

2020 No chemicals

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Abigail Burton

***ERG (EPA Contractor) on behalf of***

TRI Data Quality Program

US EPA

Region 9

Email sent on 03/29/2022 01:52pm

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Toxics Release Inventory (TRI) Data Quality Questions [(U.S. NAVY NBVC NAVAL AIR STATION POINT MUGU)  
(TRIFID: 93042SNVYN311MA)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

Tue Mar 29 13:51:37 UTC 2022

Dear KEITH CRITORIA and THERESA MILLER:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: U.S. NAVY NBVC NAVAL AIR STATION POINT MUGU - (TRIFID: 93042SNVYN311MA) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 1 hazardous waste shipments (some e-Manifest #s: 1) totaling 10,890 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, But your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

*Step 1:*

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=4b2c4fb3-e4c3-44ec-9a3d-ec63ae80b9bd&target=b3ee4c0f-c304-4ddb-ba2c-1649334e08a3>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

*Step 2:*

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare

Abigail Burton updated the Error Status from "Unresolved" to "Resolved" with Facility Response Code "BRT - Below chemical activity (manufacturing, processing, otherwise use) reporting threshold." for Error Code PFAS-NOT-F and reporting year 2020. Facility used 28 gallons of older AFFF in 2020, with PFOS concentration of 5,650,000 parts per billion = 1.3 lb PFOS

**SUEZ WATER TECHNOLOGIES & SOLUTIONS INC -  
BAKERSFIELD (93308BTZLB3050P)  
3050 PEGASUS RD, BAKERSFIELD, CA 93308 (Region 9)**

**EPA Contractor Email – OG-1**

Contractor Email

03/29/2022 09:37am

From: *Abigail Burton*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(SUEZ WATER TECHNOLOGIES & SOLUTIONS INC - BAKERSFIELD) (TRIFID: 93308BTZLB3050P)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To              | E-Mail Address         |
|----------------------|------------------------|
| Self: Abigail Burton | abby.burton@erg.com    |
| To: JAISON THOMAS    | JAISON.THOMAS@SUEZ.COM |
| To: JOHN MASON       | JOHN.MASON@SUEZ.COM    |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(SUEZ WATER TECHNOLOGIES & SOLUTIONS INC - BAKERSFIELD) (TRIFID: 93308BTZLB3050P)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 29 13:37:43 UTC 2022

Dear JAISON THOMAS and JOHN MASON:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: *SUEZ WATER TECHNOLOGIES & SOLUTIONS INC - BAKERSFIELD*) - (TRIFID: 93308BTZLB3050P) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 3 hazardous waste shipments (some e-Manifest #: 3) totaling 21,669 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=a26bebe8-777a-4ef1-8616-526a67c0f3c7&target=abf01d9c-eb82-45b6-9e09-97bb9ad7a230>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

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If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

**EPA Contractor Email – OG-2**

Contractor Email

04/29/2022 04:00pm

From: *Abigail Burton*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To              | E-Mail Address         |
|----------------------|------------------------|
| Self: Abigail Burton | abby.burton@erg.com    |
| To: JAISON THOMAS    | JAISON.THOMAS@SUEZ.COM |
| To: JOHN MASON       | JOHN.MASON@SUEZ.COM    |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Region 9

Fri Apr 29 20:00:29 UTC 2022

Dear JAISON THOMAS and JOHN MASON:

EPA would like to inform you that data quality issues raised for your facility [SUEZ WATER TECHNOLOGIES & SOLUTIONS INC - BAKERSFIELD (TRIFID: 93308BTZLB3050P)] during reporting year 2020 Adhoc Data Quality Checks are resolved for the following:

Reporting Year(s) Chemicals

2020 No chemicals

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Abigail Burton

***ERG (EPA Contractor) on behalf of***

TRI Data Quality Program

US EPA

Region 9

**Email sent on 03/29/2022 01:37pm**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(SUEZ WATER TECHNOLOGIES & SOLUTIONS INC - BAKERSFIELD) (TRIFID: 93308BTZLB3050P)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 29 13:37:43 UTC 2022

Dear JAISON THOMAS and JOHN MASON:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: *SUEZ WATER TECHNOLOGIES & SOLUTIONS INC - BAKERSFIELD* - (TRIFID: 93308BTZLB3050P) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

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***How do I respond to this inquiry? (Step 1 is always required)***

*Step 1:*

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=a26bebe8-777a-4ef1-8616-526a67c0f3c7&target=abf01d9c-eb82-45b6-9e09-97bb9ad7a230>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

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MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

### **EPA Contractor Email – OG-3**

**From:** Abby Burton

**Sent:** Friday, April 29, 2022 1:46 PM

**To:** Mason, John (WTS) <[john.mason@suez.com](mailto:john.mason@suez.com)>

**Cc:** Vilchez, Mayrem (WTS) <[mayrem.vilchez@suez.com](mailto:mayrem.vilchez@suez.com)>; Hill, Zeke (WTS) <[zeke.hill@suez.com](mailto:zeke.hill@suez.com)>; Thomas, Jaison (WTS) <[jaison.thomas@suez.com](mailto:jaison.thomas@suez.com)>; Trippetti, Jennifer (WTS) <[jennifer.trippetti@suez.com](mailto:jennifer.trippetti@suez.com)>; Berty, Imre J. <[IMRE.J.BERTY@leidos.com](mailto:IMRE.J.BERTY@leidos.com)>

**Subject:** RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Thanks for the information. I don't know why you're having issues with the questionnaire, but I've logged the response for you. You should receive an auto-generated "DQ issue resolved" email soon.

Best,

Abby

Abby Burton | **ERG (EPA Contractor)** | 908.251.7161 (mobile) | she/her/hers

### **Facility Response – IC-1**

**From:** Mason, John (WTS) <[john.mason@suez.com](mailto:john.mason@suez.com)>

**Sent:** Friday, April 29, 2022 1:16 PM

**To:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>

**Cc:** Vilchez, Mayrem (WTS) <[mayrem.vilchez@suez.com](mailto:mayrem.vilchez@suez.com)>; Hill, Zeke (WTS) <[zeke.hill@suez.com](mailto:zeke.hill@suez.com)>; Thomas, Jaison (WTS) <[jaison.thomas@suez.com](mailto:jaison.thomas@suez.com)>; Trippetti, Jennifer (WTS) <[jennifer.trippetti@suez.com](mailto:jennifer.trippetti@suez.com)>; Berty, Imre J.

<[IMRE.J.BERTY@leidos.com](mailto:IMRE.J.BERTY@leidos.com)>

**Subject:** FW: Reminder: Response Requested: TRI Data Quality Questions due April 29

Abby:

I hope you are well. We followed up with Corporate and reviewed and validated, that at no time did this facility transfer approximately 3 hazardous waste shipments (some e-Manifests #s: 3) totaling 21,669 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, TRI-listed PFAS chemicals for the reporting year 2020. I attempted to go on line and submit a response and follow the questionnaire, but no transfer or response to the correspondence could be completed. If there is an additional format that can be submitted, please advise. Thank You for your time.

Best Regards:

**John E. Mason**

**Health and Safety Specialist**

Water Technologies & Solutions

Office: +1 661-525-7039

Mobile: +1 442-218-5626



**From:** Mason, John (WTS) <[john.mason@suez.com](mailto:john.mason@suez.com)>

**Sent:** Thursday, April 28, 2022 10:51 AM

**To:** Mason, John (WTS) <[john.mason@suez.com](mailto:john.mason@suez.com)>

**Subject:** FW: Reminder: Response Requested: TRI Data Quality Questions due April 29

**From:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>

**Sent:** Thursday, April 14, 2022 11:48 AM

**To:** Mason, John (WTS) <[JOHN.MASON@SUEZ.COM](mailto:JOHN.MASON@SUEZ.COM)>; Thomas, Jaison (WTS) <[JAISON.THOMAS@SUEZ.COM](mailto:JAISON.THOMAS@SUEZ.COM)>

**Subject:** Reminder: Response Requested: TRI Data Quality Questions due April 29

Hello,

This is a reminder that EPA is requesting your response to the following Toxics Release Inventory data quality question. Even if you believe the data in question is correct and no changes are required, please fill out the survey linked below so this issue can be considered resolved.

Thank you for your cooperation.

Sincerely,

Abby Burton

**ERG (EPA Contractor) on behalf of EPA Region 9**

**From:** [abby.burton@erg.com](mailto:abby.burton@erg.com) <[abby.burton@erg.com](mailto:abby.burton@erg.com)>

**Sent:** Tuesday, March 29, 2022 9:44 AM

**To:** [JOHN.MASON@SUEZ.COM](mailto:JOHN.MASON@SUEZ.COM); Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>; [JAISON.THOMAS@SUEZ.COM](mailto:JAISON.THOMAS@SUEZ.COM)

**Subject:** Toxics Release Inventory (TRI) Data Quality Questions [(SUEZ WATER TECHNOLOGIES & SOLUTIONS INC - BAKERSFIELD) (TRIFID: 93308BTZLB3050P)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(SUEZ WATER TECHNOLOGIES & SOLUTIONS INC - BAKERSFIELD) (TRIFID: 93308BTZLB3050P)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 29 13:37:43 UTC 2022

Dear JAISON THOMAS and JOHN MASON:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: SUEZ WATER TECHNOLOGIES & SOLUTIONS INC - BAKERSFIELD) - (TRIFID: 93308BTZLB3050P) for reporting year(s) 2020 has been identified for follow-up due to the following:**

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***How do I respond to this inquiry? (Step 1 is always required)***

*Step 1:*

Begin by answering the questions on the following questionnaire:

<https://trimwebmod.epa.gov/cdx-tri-quest/questionnaire?survey=a26bebe8-777a-4ef1-8616-526a67c0f3c7&target=abf01d9c-eb82-45b6-9e09-97bb9ad7a230>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

Step 2:

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

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If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

**Facility Response – IC-2**

Subject: Facility Response Form

Apr 29, 2022 6:19:05 PM

From: John E Mason

(144) 221-85626

john.mason@suez.com

Contractor Company Name: SUEZ

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

PFAS-NOT-F RY 2020

The source of these releases and quantities are listed below:

| Response            | Reporting Year<br>(if applicable) |
|---------------------|-----------------------------------|
| No Change           |                                   |
| Reason for Response | 2020                              |

.....

**US DOD USAF EDWARDS AFB CA (93524RFRCF1SROS)  
120 N ROSAMOND BLVD, EDWARDS, CA 93524 (Region 9)**

**EPA Contractor Email – OG-1**

Contractor Email

03/29/2022 09:53am

From: *Abigail Burton*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF EDWARDS AFB CA) (TRIFID: 93524RFRCF1SROS)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To              | E-Mail Address           |
|----------------------|--------------------------|
| Self: Abigail Burton | abby.burton@erg.com      |
| To: GARY HATCH       | GARY.HATCH@US.AF.MIL     |
| To: MARC MINNECI     | MARC.MINNECI.1@US.AF.MIL |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF EDWARDS AFB CA) (TRIFID: 93524RFRCF1SROS)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 29 13:53:01 UTC 2022

Dear MARC MINNECI and GARY HATCH:

his email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Benzene submitted to EPA from your facility: *US DOD USAF EDWARDS AFB CA - (TRIFID: 93524RFRCF1SROS)* for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- It appears your facility has sent approximately 5 shipments (sub e-Manifest IDs) totaling 160,075 pounds of hazardous waste listed containing Benzene to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Benzene for reporting year 2020. Could you please review your calculations and submit a new report for Benzene for reporting year 2020, if needed.

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 5 hazardous waste shipments (some e-Manifest #: 5) totaling 123,320 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=0b5e7fe7-b271-48f1-bcef-a0e1a777ddb1&target=4aa3c2c1-626b-4842-af18-5fadf338395a>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

## Facility Response – IC-1

**From:** VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>

**Sent:** Tuesday, April 19, 2022 5:44 PM

**To:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>

**Subject:** FW: Reminder: Response Requested: TRI Data Quality Questions due April 29

Good afternoon,

Is it possible to get the manifest numbers so we can determine where the waste came from which will then tell us why it was not reported. Thank you.

Ms. Van Norden

JEANETTE L. VAN NORDEN, NH-03, DAF

Hazardous Material Program Manager

Environmental Management Division

412 Civil Engineer Group

120 N. Rosamond Blvd, Ste. A

Edwards AFB CA 93524

DSN: 527-1468

COMM: (661) 860-3014

NIPR: [jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil) <[mailto:jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>

**From:** THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil)>

**Sent:** Tuesday, April 19, 2022 2:35 PM

**To:** VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>; Spesshardt, Scott <[sspesshardt@eqm.com](mailto:sspesshardt@eqm.com)>; Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>; Alberthal, Mike <[Mike.Alberthal@tetrattech.com](mailto:Mike.Alberthal@tetrattech.com)>; HILL, SHANNAN M CTR USAF AFMC 412 CEG/CEVC <[shannan.hill.ctr@us.af.mil](mailto:shannan.hill.ctr@us.af.mil)>; SOLIZ, SHARON M CTR USAF AFMC 412 CEG/CEVC <[sharon.soliz.ctr@us.af.mil](mailto:sharon.soliz.ctr@us.af.mil)>

**Cc:** Maskrey, Laura <[LAURA.MASKREY@tetrattech.com](mailto:LAURA.MASKREY@tetrattech.com)>; WEBER, JENNIFER A NH-02 USAF AFMC 412 CEG/CEVC <[jennifer.weber.2@us.af.mil](mailto:jennifer.weber.2@us.af.mil)>; SILVA, JOSEFA L NH-03 USAF AFMC 412 CEG/CEVC <[josefa.silva.1@us.af.mil](mailto:josefa.silva.1@us.af.mil)>

**Subject:** RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Jeanette,

It would be easy to figure out what that 160,075 lb. of waste containing benzene is if we know what those 5 manifests are. Does EPA list those manifest #s?

Maung Thein

Environmental Quality Management

EAFB Hazardous Waste Storage Facility

661-277-1436 - Desk

661-277-3681 - Main office

## **EPA Contractor Email – OG-2**

**From:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>

**Sent:** Thursday, April 14, 2022 12:19 PM

**To:** HATCH, GARY L NH-03 USAF AFMC 412 TW/PA <[gary.hatch@us.af.mil](mailto:gary.hatch@us.af.mil)>; MINNECI, MARC G NH-04 USAF AFMC 412 CEG/CEVC <[marc.minneci.1@us.af.mil](mailto:marc.minneci.1@us.af.mil)>

**Subject:** [Non-DoD Source] Reminder: Response Requested: TRI Data Quality Questions due April 29

Hello,

This is a reminder that EPA is requesting your response to the following Toxics Release Inventory data quality question. Even if you believe the data in question is correct and no changes are required, please fill out the survey linked below so this issue can be considered resolved.

Thank you for your cooperation.

Sincerely,

Abby Burton

**ERG (EPA Contractor) on behalf of** EPA Region 9

**From:** [abby.burton@erg.com](mailto:abby.burton@erg.com) <[abby.burton@erg.com](mailto:abby.burton@erg.com)>

**Sent:** Tuesday, March 29, 2022 9:59 AM

**To:** [GARY.HATCH@US.AF.MIL](mailto:GARY.HATCH@US.AF.MIL); Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>; [MARC.MINNECI.1@US.AF.MIL](mailto:MARC.MINNECI.1@US.AF.MIL)

**Subject:** Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF EDWARDS AFB CA) (TRIFID: 93524RFRCF1SROS)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

### **UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF EDWARDS AFB CA) (TRIFID: 93524RFRCF1SROS)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 29 13:53:01 UTC 2022

Dear MARC MINNECI and GARY HATCH:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Benzene submitted to EPA from your facility: US DOD USAF EDWARDS AFB CA - (TRIFID: 93524RFRCF1SROS) for reporting year(s) 2020 has been identified for follow-up due to the following:**

**Reporting Year 2020**

- It appears your facility has sent approximately 5 shipments (sub e-Manifest IDs) totaling 160,075 pounds of hazardous waste listed containing Benzene to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Benzene for reporting year 2020. Could you please review your calculations and submit a new report for Benzene for reporting year 2020, if needed.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 5 hazardous waste shipments (some e-Manifest #: 5) totaling 123,320 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=0b5e7fe7-b271-48f1-bcef-a0e1a777ddb1&target=4aa3c2c1-626b-4842-af18-5fadf338395a>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

### EPA Contractor Email – OG-3

From: Abby Burton

Sent: Wednesday, April 20, 2022 9:33 AM

To: VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <jeanette.van\_norden.1@us.af.mil>

Subject: RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Hi Ms. Van Norden,

Attached is the information I have on these shipments. Note:

The "sub-manifest ID" is identifying the waste line on the e-manifest and is the e-manifest ID + 1-digit line number. The hazardous waste quantities are the entire shipment weights, and the weight of benzene in the waste may be lower.

Best,

Abby

Abby Burton | ERG (EPA Contractor) | 908.251.7161 (mobile) | she/her/hers

-----Original Message-----

From: VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>

Sent: Tuesday, April 19, 2022 5:44 PM

To: Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>

Subject: FW: Reminder: Response Requested: TRI Data Quality Questions due April 29

**From:** Abby Burton

**Sent:** Wednesday, April 20, 2022 10:07 AM

**To:** THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <maung.thein.ctr@us.af.mil>

**Cc:** Hill, Shannan <Shannan.Hill@tetrattech.com>; VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC

<jeanette.van\_norden.1@us.af.mil>; SILVA, JOSEFA L NH-03 USAF AFMC 412 CEG/CEVC <josefa.silva.1@us.af.mil>

**Subject:** RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Attached is the information I have on these shipments. Note:

The "sub-manifest ID" is identifying the waste line on the e-manifest and is the e-manifest ID + 1-digit line number.

The hazardous waste quantities are the entire shipment weights, and the weight of benzene in the waste may be lower.

Best,

Abby

Abby Burton | **ERG (EPA Contractor)** | 908.251.7161 (mobile) | she/her/hers

**From:** THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil)>  
**Sent:** Tuesday, April 19, 2022 6:47 PM  
**To:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>  
**Cc:** Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>; VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>; SILVA, JOSEFA L NH-03 USAF AFMC 412 CEG/CEVC <[josefa.silva.1@us.af.mil](mailto:josefa.silva.1@us.af.mil)>  
**Subject:** FW: Reminder: Response Requested: TRI Data Quality Questions due April 29

Hi Abby,

Do you have a list of the 5 manifests that EPA is indicating that Edwards AFB shipped 160,075 Lb. of waste containing benzene in 2020?

Maung Thein

Environmental Quality Management

EAFB Hazardous Waste Storage Facility

661-277-1436 - Desk

661-277-3681 - Main office

**From:** SILVA, JOSEFA L NH-03 USAF AFMC 412 CEG/CEVC <[josefa.silva.1@us.af.mil](mailto:josefa.silva.1@us.af.mil)>  
**Sent:** Tuesday, April 19, 2022 3:21 PM  
**To:** VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>; Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>; THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil)>; Alberthal, Mike <[Mike.Alberthal@tetrattech.com](mailto:Mike.Alberthal@tetrattech.com)>; HILL, SHANNAN M CTR USAF AFMC 412 CEG/CEVC <[shannan.hill.ctr@us.af.mil](mailto:shannan.hill.ctr@us.af.mil)>; SOLIZ, SHARON M CTR USAF AFMC 412 CEG/CEVC <[sharon.soliz.ctr@us.af.mil](mailto:sharon.soliz.ctr@us.af.mil)>; Scott Spesshardt <[sspesshardt@eqm.com](mailto:sspesshardt@eqm.com)>  
**Cc:** Maskrey, Laura <[LAURA.MASKREY@tetrattech.com](mailto:LAURA.MASKREY@tetrattech.com)>; WEBER, JENNIFER A NH-02 USAF AFMC 412 CEG/CEVC <[jennifer.weber.2@us.af.mil](mailto:jennifer.weber.2@us.af.mil)>  
**Subject:** RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Hi,

Would anyone have the five manifest in question? This way we can take a look at what exactly was noted in the manifest.

Josie

*Josefa L. Silva*

*Water Quality/POL Tanks Program Manager*

*412th Civil Engineer Group*

*120 N. Rosamond Boulevard*

*Edwards AFB, CA 93524*

*Office: 661-277-9223*

*Fax: 661-275-2417*

**From:** VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>  
**Sent:** Tuesday, April 19, 2022 1:40 PM  
**To:** Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>; THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil)>; Alberthal, Mike <[Mike.Alberthal@tetrattech.com](mailto:Mike.Alberthal@tetrattech.com)>; HILL, SHANNAN M CTR USAF AFMC 412 CEG/CEVC <[shannan.hill.ctr@us.af.mil](mailto:shannan.hill.ctr@us.af.mil)>; SOLIZ, SHARON M CTR USAF AFMC 412 CEG/CEVC <[sharon.soliz.ctr@us.af.mil](mailto:sharon.soliz.ctr@us.af.mil)>; Scott Spesshardt <[sspesshardt@eqm.com](mailto:sspesshardt@eqm.com)>  
**Cc:** Maskrey, Laura <[LAURA.MASKREY@tetrattech.com](mailto:LAURA.MASKREY@tetrattech.com)>; WEBER, JENNIFER A NH-02 USAF AFMC 412 CEG/CEVC <[jennifer.weber.2@us.af.mil](mailto:jennifer.weber.2@us.af.mil)>; SILVA, JOSEFA L NH-03 USAF AFMC 412 CEG/CEVC <[josefa.silva.1@us.af.mil](mailto:josefa.silva.1@us.af.mil)>  
**Subject:** RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Any ideas on how I should respond? I'm thinking that these items were either spills or exempt from reporting. It appears that I have to fill out a questionnaire or something, but it would probably be good to know what I should say before I start filling anything out. Maybe Josie would know if there was a spill that caused these disposals?

Jeanette

JEANETTE L. VAN NORDEN, NH-03, DAF

Hazardous Material Program Manager

Environmental Management Division

412 Civil Engineer Group

120 N. Rosamond Blvd, Ste. A

Edwards AFB CA 93524

DSN: 527-1468

COMM: (661) 860-3014

NIPR: [jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil) <[mailto:jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>

**From:** Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>  
**Sent:** Monday, April 18, 2022 3:28 PM  
**To:** THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil)>; VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>; Alberthal, Mike <[Mike.Alberthal@tetrattech.com](mailto:Mike.Alberthal@tetrattech.com)>; HILL, SHANNAN M CTR USAF AFMC 412 CEG/CEVC <[shannan.hill.ctr@us.af.mil](mailto:shannan.hill.ctr@us.af.mil)>; SOLIZ, SHARON M CTR USAF AFMC 412 CEG/CEVC <[sharon.soliz.ctr@us.af.mil](mailto:sharon.soliz.ctr@us.af.mil)>; Scott Spesshardt <[sspesshardt@eqm.com](mailto:sspesshardt@eqm.com)>  
**Cc:** Maskrey, Laura <[LAURA.MASKREY@tetrattech.com](mailto:LAURA.MASKREY@tetrattech.com)>  
**Subject:** [Non-DoD Source] RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

No. I have no idea. If you look below, the comment is from an EPA contractor. I don't have anything except this email.

**From:** THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil)>  
**Sent:** Monday, April 18, 2022 3:16 PM

**To:** Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>; VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>; Alberthal, Mike <[Mike.Alberthal@tetrattech.com](mailto:Mike.Alberthal@tetrattech.com)>; Hill, Shannan <[shannan.hill.ctr@us.af.mil](mailto:shannan.hill.ctr@us.af.mil)>; SOLIZ, SHARON M CTR USAF AFMC 412 CEG/CEVC <[sharon.soliz.ctr@us.af.mil](mailto:sharon.soliz.ctr@us.af.mil)>; Scott Spesshardt <[sspesshardt@eqm.com](mailto:sspesshardt@eqm.com)>

**Cc:** Maskrey, Laura <[LAURA.MASKREY@tetrattech.com](mailto:LAURA.MASKREY@tetrattech.com)>

**Subject:** RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Shannan,

Do you have the manifest IDs for those 5 shipments in question?

Maung Thein

Environmental Quality Management

EAFB Hazardous Waste Storage Facility

661-277-1436 - Desk

661-277-3681 - Main office

**From:** Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>

**Sent:** Monday, April 18, 2022 10:05 AM

**To:** VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>; Alberthal, Mike <[Mike.Alberthal@tetrattech.com](mailto:Mike.Alberthal@tetrattech.com)>; HILL, SHANNAN M CTR USAF AFMC 412 CEG/CEVC <[shannan.hill.ctr@us.af.mil](mailto:shannan.hill.ctr@us.af.mil)>; THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil)>; SOLIZ, SHARON M CTR USAF AFMC 412 CEG/CEVC <[sharon.soliz.ctr@us.af.mil](mailto:sharon.soliz.ctr@us.af.mil)>; Scott Spesshardt <[sspesshardt@eqm.com](mailto:sspesshardt@eqm.com)>

**Cc:** Maskrey, Laura <[LAURA.MASKREY@tetrattech.com](mailto:LAURA.MASKREY@tetrattech.com)>

**Subject:** [Non-DoD Source] RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Jeanette,

I am attaching our work on TRI hazardous waste from 2020. This spreadsheet takes what I get from HWSF and adds our calculations based upon the waste profiles for each item. You can see where I applied a percentage of benzene based upon the data supplied. I have no idea where they are getting the amount of waste with benzene. The email below says that

It appears your facility has sent approximately 5 shipments (sub e-Manifest IDs) totaling 160,075 pounds of hazardous waste listed containing Benzene to offsite location(s) for reporting year 2020,.

I don't see this in my spreadsheet. I see 112 pounds of benzene. Let's loop in Haz waste. Maybe they can help us figure this out!

**From:** VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.n\\_norden.1@us.af.mil](mailto:jeanette.n_norden.1@us.af.mil)>

**Sent:** Monday, April 18, 2022 8:15 AM

**To:** Alberthal, Mike <[Mike.Alberthal@tetrattech.com](mailto:Mike.Alberthal@tetrattech.com)>; Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>; Hill, Shannan <[shannan.hill.ctr@us.af.mil](mailto:shannan.hill.ctr@us.af.mil)>

**Subject:** FW: Reminder: Response Requested: TRI Data Quality Questions due April 29

**Importance:** High

Is this something you guys could do?

Jeanette

**From:** MINNECI, MARC G NH-04 USAF AFMC 412 CEG/CEVC <[marc.minneci.1@us.af.mil](mailto:marc.minneci.1@us.af.mil)>  
**Sent:** Thursday, April 14, 2022 1:20 PM  
**To:** VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>  
**Subject:** FW: Reminder: Response Requested: TRI Data Quality Questions due April 29  
**Importance:** High

Jeanette,

Got this inquiry below from a contractor supporting EPA regarding our TRI submission for 2020.

Please see email below (focus on yellow highlight)

Please review the inquiry and provide an answer back to be as soon as possible.

Thanks,

Marc

**MARC G. MINNECI, M.S. Env. E., NH-0819-04 (GS-14), DAF**

Acting Chief, Environmental Management Division

412 Civil Engineer Group

120 N. Rosamond Blvd, Ste. A

Edwards AFB CA 93524

DSN: 527-1478

COMM: (661) 277-1478

NIPR: [marc.minneci.1@us.af.mil](mailto:marc.minneci.1@us.af.mil)

#### **EPA Contractor Email – OG-4**

**From:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>  
**Sent:** Thursday, April 14, 2022 12:19 PM  
**To:** HATCH, GARY L NH-03 USAF AFMC 412 TW/PA <[gary.hatch@us.af.mil](mailto:gary.hatch@us.af.mil)>; MINNECI, MARC G NH-04 USAF AFMC 412 CEG/CEVC <[marc.minneci.1@us.af.mil](mailto:marc.minneci.1@us.af.mil)>  
**Subject:** [Non-DoD Source] Reminder: Response Requested: TRI Data Quality Questions due April 29

Hello,

This is a reminder that EPA is requesting your response to the following Toxics Release Inventory data quality question. Even if you believe the data in question is correct and no changes are required, please fill out the survey linked below so this issue can be considered resolved.

Thank you for your cooperation.

Sincerely,

Abby Burton

**ERG (EPA Contractor) on behalf of** EPA Region 9

**From:** [abby.burton@erg.com](mailto:abby.burton@erg.com) <[abby.burton@erg.com](mailto:abby.burton@erg.com)>

**Sent:** Tuesday, March 29, 2022 9:59 AM

**To:** [GARY.HATCH@US.AF.MIL](mailto:GARY.HATCH@US.AF.MIL); Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>; [MARC.MINNECI.1@US.AF.MIL](mailto:MARC.MINNECI.1@US.AF.MIL)

**Subject:** Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF EDWARDS AFB CA) (TRIFID: 93524RFRCF1SROS)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF EDWARDS AFB CA) (TRIFID: 93524RFRCF1SROS)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 29 13:53:01 UTC 2022

Dear MARC MINNECI and GARY HATCH:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Benzene submitted to EPA from your facility: *US DOD USAF EDWARDS AFB CA - (TRIFID: 93524RFRCF1SROS)* for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- It appears your facility has sent approximately 5 shipments (sub e-Manifest IDs) totaling 160,075 pounds of hazardous waste listed containing Benzene to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Benzene for reporting year 2020. Could you please review your calculations and submit a new report for Benzene for reporting year 2020, if needed.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 5 hazardous waste shipments (some e-Manifest #: 5) totaling 123,320 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any

report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=0b5e7fe7-b271-48f1-bcef-a0e1a777ddb1&target=4aa3c2c1-626b-4842-af18-5fadf338395a>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

**From:** THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <maung.thein.ctr@us.af.mil>

**Sent:** Wednesday, April 20, 2022 12:44 PM

**To:** Abby Burton <Abby.Burton@erg.com>

**Cc:** Hill, Shannan <Shannan.Hill@tetrattech.com>; VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <jeanette.van\_norden.1@us.af.mil>; SILVA, JOSEFA L NH-03 USAF AFMC 412 CEG/CEVC <josefa.silva.1@us.af.mil>

**Subject:** RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Good Morning Abby. Thank you so much.

Maung Thein  
Environmental Quality Management  
EAFB Hazardous Waste Storage Facility  
661-277-1436 - Desk  
661-277-3681 - Main office

## EPA Contractor Email – OG-5

**From:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>  
**Sent:** Wednesday, April 20, 2022 7:07 AM  
**To:** THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil)>  
**Cc:** Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>; VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>; SILVA, JOSEFA L NH-03 USAF AFMC 412 CEG/CEVC <[josefa.silva.1@us.af.mil](mailto:josefa.silva.1@us.af.mil)>  
**Subject:** [URL Verdict: Unknown][Non-DoD Source] RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Attached is the information I have on these shipments. Note:  
The "sub-manifest ID" is identifying the waste line on the e-manifest and is the e-manifest ID + 1-digit line number  
The hazardous waste quantities are the entire shipment weights, and the weight of benzene in the waste may be lower.

Best,  
Abby

Abby Burton | **ERG (EPA Contractor)** | 908.251.7161 (mobile) | she/her/hers

**From:** THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil)>  
**Sent:** Tuesday, April 19, 2022 6:47 PM  
**To:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>  
**Cc:** Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>; VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>; SILVA, JOSEFA L NH-03 USAF AFMC 412 CEG/CEVC <[josefa.silva.1@us.af.mil](mailto:josefa.silva.1@us.af.mil)>  
**Subject:** FW: Reminder: Response Requested: TRI Data Quality Questions due April 29

Hi Abby,

Do you have a list of the 5 manifests that EPA is indicating that Edwards AFB shipped 160,075 Lb. of waste containing benzene in 2020?

Maung Thein  
Environmental Quality Management  
EAFB Hazardous Waste Storage Facility  
661-277-1436 - Desk

661-277-3681 - Main office

**From:** SILVA, JOSEFA L NH-03 USAF AFMC 412 CEG/CEVC <[josefa.silva.1@us.af.mil](mailto:josefa.silva.1@us.af.mil)>  
**Sent:** Tuesday, April 19, 2022 3:21 PM  
**To:** VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>; Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>; THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil)>; Alberthal, Mike <[Mike.Alberthal@tetrattech.com](mailto:Mike.Alberthal@tetrattech.com)>; HILL, SHANNAN M CTR USAF AFMC 412 CEG/CEVC <[shannan.hill.ctr@us.af.mil](mailto:shannan.hill.ctr@us.af.mil)>; SOLIZ, SHARON M CTR USAF AFMC 412 CEG/CEVC <[sharon.soliz.ctr@us.af.mil](mailto:sharon.soliz.ctr@us.af.mil)>; Scott Spesshardt <[sspesshardt@eqm.com](mailto:sspesshardt@eqm.com)>  
**Cc:** Maskrey, Laura <[LAURA.MASKREY@tetrattech.com](mailto:LAURA.MASKREY@tetrattech.com)>; WEBER, JENNIFER A NH-02 USAF AFMC 412 CEG/CEVC <[jennifer.weber.2@us.af.mil](mailto:jennifer.weber.2@us.af.mil)>  
**Subject:** RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Hi,

Would anyone have the five manifest in question? This way we can take a look at what exactly was noted in the manifest.

Josie

*Josefa L. Silva*

*Water Quality/POL Tanks Program Manager*

*412th Civil Engineer Group*

*120 N. Rosamond Boulevard*

*Edwards AFB, CA 93524*

*Office: 661-277-9223*

*Fax: 661-275-2417*

**From:** VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>  
**Sent:** Tuesday, April 19, 2022 1:40 PM  
**To:** Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>; THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil)>; Alberthal, Mike <[Mike.Alberthal@tetrattech.com](mailto:Mike.Alberthal@tetrattech.com)>; HILL, SHANNAN M CTR USAF AFMC 412 CEG/CEVC <[shannan.hill.ctr@us.af.mil](mailto:shannan.hill.ctr@us.af.mil)>; SOLIZ, SHARON M CTR USAF AFMC 412 CEG/CEVC <[sharon.soliz.ctr@us.af.mil](mailto:sharon.soliz.ctr@us.af.mil)>; Scott Spesshardt <[sspesshardt@eqm.com](mailto:sspesshardt@eqm.com)>  
**Cc:** Maskrey, Laura <[LAURA.MASKREY@tetrattech.com](mailto:LAURA.MASKREY@tetrattech.com)>; WEBER, JENNIFER A NH-02 USAF AFMC 412 CEG/CEVC <[jennifer.weber.2@us.af.mil](mailto:jennifer.weber.2@us.af.mil)>; SILVA, JOSEFA L NH-03 USAF AFMC 412 CEG/CEVC <[josefa.silva.1@us.af.mil](mailto:josefa.silva.1@us.af.mil)>  
**Subject:** RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Any ideas on how I should respond? I'm thinking that these items were either spills or exempt from reporting. It appears that I have to fill out a questionnaire or something, but it would probably be good to know what I should say before I start filling anything out. Maybe Josie would know if there was a spill that caused these disposals?

Jeanette

JEANETTE L. VAN NORDEN, NH-03, DAF

Hazardous Material Program Manager

Environmental Management Division

412 Civil Engineer Group

120 N. Rosamond Blvd, Ste. A

Edwards AFB CA 93524

DSN: 527-1468

COMM: (661) 860-3014

NIPR: [jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil) <[mailto:jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>

**From:** Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>

**Sent:** Monday, April 18, 2022 3:28 PM

**To:** THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil)>; VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>; Alberthal, Mike <[Mike.Alberthal@tetrattech.com](mailto:Mike.Alberthal@tetrattech.com)>; HILL, SHANNAN M CTR USAF AFMC 412 CEG/CEVC <[shannan.hill.ctr@us.af.mil](mailto:shannan.hill.ctr@us.af.mil)>; SOLIZ, SHARON M CTR USAF AFMC 412 CEG/CEVC <[sharon.soliz.ctr@us.af.mil](mailto:sharon.soliz.ctr@us.af.mil)>; Scott Spesshardt <[sspesshardt@eqm.com](mailto:sspesshardt@eqm.com)>

**Cc:** Maskrey, Laura <[LAURA.MASKREY@tetrattech.com](mailto:LAURA.MASKREY@tetrattech.com)>

**Subject:** [Non-DoD Source] RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

No. I have no idea. If you look below, the comment is from an EPA contractor. I don't have anything except this email.

**From:** THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil)>

**Sent:** Monday, April 18, 2022 3:16 PM

**To:** Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>; VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>; Alberthal, Mike <[Mike.Alberthal@tetrattech.com](mailto:Mike.Alberthal@tetrattech.com)>; Hill, Shannan <[shannan.hill.ctr@us.af.mil](mailto:shannan.hill.ctr@us.af.mil)>; SOLIZ, SHARON M CTR USAF AFMC 412 CEG/CEVC <[sharon.soliz.ctr@us.af.mil](mailto:sharon.soliz.ctr@us.af.mil)>; Scott Spesshardt <[sspesshardt@eqm.com](mailto:sspesshardt@eqm.com)>

**Cc:** Maskrey, Laura <[LAURA.MASKREY@tetrattech.com](mailto:LAURA.MASKREY@tetrattech.com)>

**Subject:** RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Shannan,

Do you have the manifest IDs for those 5 shipments in question?

Maung Thein

Environmental Quality Management

EAFB Hazardous Waste Storage Facility

661-277-1436 - Desk

661-277-3681 - Main office

**From:** Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>

**Sent:** Monday, April 18, 2022 10:05 AM

**To:** VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>; Alberthal, Mike <[Mike.Alberthal@tetrattech.com](mailto:Mike.Alberthal@tetrattech.com)>; HILL, SHANNAN M CTR USAF AFMC 412 CEG/CEVC <[shannan.hill.ctr@us.af.mil](mailto:shannan.hill.ctr@us.af.mil)>; THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil)>; SOLIZ, SHARON M CTR USAF AFMC 412 CEG/CEVC <[sharon.soliz.ctr@us.af.mil](mailto:sharon.soliz.ctr@us.af.mil)>; Scott Spesshardt <[sspesshardt@egm.com](mailto:sspesshardt@egm.com)>

**Cc:** Maskrey, Laura <[LAURA.MASKREY@tetrattech.com](mailto:LAURA.MASKREY@tetrattech.com)>

**Subject:** [Non-DoD Source] RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Jeanette,

I am attaching our work on TRI hazardous waste from 2020. This spreadsheet takes what I get from HWSF and adds our calculations based upon the waste profiles for each item. You can see where I applied a percentage of benzene based upon the data supplied. I have no idea where they are getting the amount of waste with benzene. The email below says that

It appears your facility has sent approximately 5 shipments (sub e-Manifest IDs) totaling 160,075 pounds of hazardous waste listed containing Benzene to offsite location(s) for reporting year 2020,.

I don't see this in my spreadsheet. I see 112 pounds of benzene. Let's loop in Haz waste. Maybe they can help us figure this out!

**From:** VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.n\\_norden.1@us.af.mil](mailto:jeanette.n_norden.1@us.af.mil)>

**Sent:** Monday, April 18, 2022 8:15 AM

**To:** Alberthal, Mike <[Mike.Alberthal@tetrattech.com](mailto:Mike.Alberthal@tetrattech.com)>; Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>; Hill, Shannan <[shannan.hill.ctr@us.af.mil](mailto:shannan.hill.ctr@us.af.mil)>

**Subject:** FW: Reminder: Response Requested: TRI Data Quality Questions due April 29

**Importance:** High

Is this something you guys could do?

Jeanette

**From:** MINNECI, MARC G NH-04 USAF AFMC 412 CEG/CEVC <[marc.minneci.1@us.af.mil](mailto:marc.minneci.1@us.af.mil)>

**Sent:** Thursday, April 14, 2022 1:20 PM

**To:** VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>

**Subject:** FW: Reminder: Response Requested: TRI Data Quality Questions due April 29

**Importance:** High

Jeanette,

Got this inquiry below from a contractor supporting EPA regarding our TRI submission for 2020.

Please see email below (focus on yellow highlight)

Please review the inquiry and provide an answer back to be as soon as possible.

Thanks,

Marc

**MARC G. MINNECI, M.S. Env. E., NH-0819-04 (GS-14), DAF**

Acting Chief, Environmental Management Division

412 Civil Engineer Group

120 N. Rosamond Blvd, Ste. A

Edwards AFB CA 93524

DSN: 527-1478

COMM: (661) 277-1478

NIPR: [marc.minneci.1@us.af.mil](mailto:marc.minneci.1@us.af.mil)

**From:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>

**Sent:** Thursday, April 14, 2022 12:19 PM

**To:** HATCH, GARY L NH-03 USAF AFMC 412 TW/PA <[gary.hatch@us.af.mil](mailto:gary.hatch@us.af.mil)>; MINNECI, MARC G NH-04 USAF AFMC 412 CEG/CEVC <[marc.minneci.1@us.af.mil](mailto:marc.minneci.1@us.af.mil)>

**Subject:** [Non-DoD Source] Reminder: Response Requested: TRI Data Quality Questions due April 29

Hello,

This is a reminder that EPA is requesting your response to the following Toxics Release Inventory data quality question. Even if you believe the data in question is correct and no changes are required, please fill out the survey linked below so this issue can be considered resolved.

Thank you for your cooperation.

Sincerely,

Abby Burton

**ERG (EPA Contractor) on behalf of** EPA Region 9

**From:** [abby.burton@erg.com](mailto:abby.burton@erg.com) <[abby.burton@erg.com](mailto:abby.burton@erg.com)>

**Sent:** Tuesday, March 29, 2022 9:59 AM

**To:** [GARY.HATCH@US.AF.MIL](mailto:GARY.HATCH@US.AF.MIL); Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>; [MARC.MINNECI.1@US.AF.MIL](mailto:MARC.MINNECI.1@US.AF.MIL)

**Subject:** Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF EDWARDS AFB CA) (TRIFID: 93524RFRCF1SROS)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF EDWARDS AFB CA) (TRIFID: 93524RFRCF1SROS)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 29 13:53:01 UTC 2022

Dear MARC MINNECI and GARY HATCH:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Benzene submitted to EPA from your facility: *US DOD USAF EDWARDS AFB CA - (TRIFID: 93524RFRCF1SROS)* for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- It appears your facility has sent approximately 5 shipments (sub e-Manifest IDs) totaling 160,075 pounds of hazardous waste listed containing Benzene to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Benzene for reporting year 2020. Could you please review your calculations and submit a new report for Benzene for reporting year 2020, if needed.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 5 hazardous waste shipments (some e-Manifest #: 5) totaling 123,320 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

*Step 1:*

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=0b5e7fe7-b271-48f1-bcef-a0e1a777ddb1&target=4aa3c2c1-626b-4842-af18-5fadf338395a>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

*Step 2:*

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

## Facility Response – IC-2

From: VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <jeanette.van\_norden.1@us.af.mil>  
Sent: Wednesday, April 20, 2022 2:08 PM  
To: Abby Burton <Abby.Burton@erg.com>; THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <maung.thein.ctr@us.af.mil>  
Cc: Hill, Shannan <Shannan.Hill@tetrattech.com>; SILVA, JOSEFA L NH-03 USAF AFMC 412 CEG/CEVC <josefa.silva.1@us.af.mil>  
Subject: RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Abby,

Did you have this information for the 5 PFAS manifests as well? Thank you.

Jeanette

JEANETTE L. VAN NORDEN, NH-03, DAF

Hazardous Material Program Manager

Environmental Management Division

412 Civil Engineer Group

120 N. Rosamond Blvd, Ste. A

Edwards AFB CA 93524

DSN: 527-1468

COMM: (661) 860-3014

NIPR: [jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)  
<[mailto:jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>

From: Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>  
Sent: Wednesday, April 20, 2022 7:07 AM  
To: THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil)>  
Cc: Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>; VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>; SILVA, JOSEFA L NH-03 USAF AFMC 412 CEG/CEVC <[josefa.silva.1@us.af.mil](mailto:josefa.silva.1@us.af.mil)>  
Subject: [URL Verdict: Unknown][Non-DoD Source] RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Attached is the information I have on these shipments. Note:

The "sub-manifest ID" is identifying the waste line on the e-manifest and is the e-manifest ID + 1-digit line number

The hazardous waste quantities are the entire shipment weights, and the weight of benzene in the waste may be lower.

Best,

Abby

Abby Burton | ERG (EPA Contractor) | 908.251.7161 (mobile) | she/her/hers

From: THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil)>  
<<mailto:maung.thein.ctr@us.af.mil>> >  
Sent: Tuesday, April 19, 2022 6:47 PM  
To: Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com) <<mailto:Abby.Burton@erg.com>> >  
Cc: Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>  
<<mailto:Shannan.Hill@tetrattech.com>> >; VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>  
<[mailto:jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)> >; SILVA, JOSEFA L NH-03 USAF AFMC 412 CEG/CEVC <[josefa.silva.1@us.af.mil](mailto:josefa.silva.1@us.af.mil) <<mailto:josefa.silva.1@us.af.mil>> >  
Subject: FW: Reminder: Response Requested: TRI Data Quality Questions due April 29

Hi Abby,

Do you have a list of the 5 manifests that EPA is indicating that Edwards AFB shipped 160,075 Lb. of waste containing benzene in 2020?

Maung Thein

Environmental Quality Management

EAFB Hazardous Waste Storage Facility

661-277-1436 - Desk

661-277-3681 - Main office

From: SILVA, JOSEFA L NH-03 USAF AFMC 412 CEG/CEVC <josefa.silva.1@us.af.mil  
<<mailto:josefa.silva.1@us.af.mil>> >  
Sent: Tuesday, April 19, 2022 3:21 PM  
To: VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC  
<[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil) <[mailto:jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)> >;  
Hill, Shannan <Shannan.Hill@tetrattech.com  
<<mailto:Shannan.Hill@tetrattech.com>> >; THEIN, MAUNG M CTR USAF AFMC 412  
CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil) <<mailto:maung.thein.ctr@us.af.mil>> >;  
Alberthal, Mike <Mike.Alberthal@tetrattech.com  
<<mailto:Mike.Alberthal@tetrattech.com>> >; HILL, SHANNAN M CTR USAF AFMC 412  
CEG/CEVC <[shannan.hill.ctr@us.af.mil](mailto:shannan.hill.ctr@us.af.mil) <<mailto:shannan.hill.ctr@us.af.mil>> >;  
SOLIZ, SHARON M CTR USAF AFMC 412 CEG/CEVC <sharon.soliz.ctr@us.af.mil  
<<mailto:sharon.soliz.ctr@us.af.mil>> >; Scott Spesshardt <sspehardt@eqm.com  
<<mailto:sspehardt@eqm.com>> >  
Cc: Maskrey, Laura <LAURA.MASKREY@tetrattech.com  
<<mailto:LAURA.MASKREY@tetrattech.com>> >; WEBER, JENNIFER A NH-02 USAF AFMC  
412 CEG/CEVC <[jennifer.weber.2@us.af.mil](mailto:jennifer.weber.2@us.af.mil) <<mailto:jennifer.weber.2@us.af.mil>> >  
>  
Subject: RE: Reminder: Response Requested: TRI Data Quality Questions due  
April 29

Hi,

Would anyone have the five manifest in question? This way we can take a  
look at what exactly was noted in the manifest.

Josie

Josefa L. Silva  
Water Quality/POL Tanks Program Manager

412th Civil Engineer Group

120 N. Rosamond Boulevard

Edwards AFB, CA 93524

Office: 661-277-9223

Fax: 661-275-2417

From: VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC  
<[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil) <[mailto:jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)> >  
Sent: Tuesday, April 19, 2022 1:40 PM  
To: Hill, Shannan <Shannan.Hill@tetrattech.com  
<<mailto:Shannan.Hill@tetrattech.com>> >; THEIN, MAUNG M CTR USAF AFMC 412  
CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil) <<mailto:maung.thein.ctr@us.af.mil>> >;  
Alberthal, Mike <Mike.Alberthal@tetrattech.com  
<<mailto:Mike.Alberthal@tetrattech.com>> >; HILL, SHANNAN M CTR USAF AFMC 412  
CEG/CEVC <[shannan.hill.ctr@us.af.mil](mailto:shannan.hill.ctr@us.af.mil) <<mailto:shannan.hill.ctr@us.af.mil>> >;  
SOLIZ, SHARON M CTR USAF AFMC 412 CEG/CEVC <sharon.soliz.ctr@us.af.mil  
<<mailto:sharon.soliz.ctr@us.af.mil>> >; Scott Spesshardt <sspehardt@eqm.com  
<<mailto:sspehardt@eqm.com>> >

Cc: Maskrey, Laura <LAURA.MASKREY@tetrattech.com  
<<mailto:LAURA.MASKREY@tetrattech.com>> >; WEBER, JENNIFER A NH-02 USAF AFMC  
412 CEG/CEVC <[jennifer.weber.2@us.af.mil](mailto:jennifer.weber.2@us.af.mil) <<mailto:jennifer.weber.2@us.af.mil>>  
>; SILVA, JOSEFA L NH-03 USAF AFMC 412 CEG/CEVC <[josefa.silva.1@us.af.mil](mailto:josefa.silva.1@us.af.mil)  
<<mailto:josefa.silva.1@us.af.mil>> >  
Subject: RE: Reminder: Response Requested: TRI Data Quality Questions due  
April 29

Any ideas on how I should respond? I'm thinking that these items were  
either spills or exempt from reporting. It appears that I have to fill out  
a questionnaire or something, but it would probably be good to know what I  
should say before I start filling anything out. Maybe Josie would know if  
there was a spill that caused these disposals?

Jeanette

JEANETTE L. VAN NORDEN, NH-03, DAF

Hazardous Material Program Manager

Environmental Management Division

412 Civil Engineer Group

120 N. Rosamond Blvd, Ste. A

Edwards AFB CA 93524

DSN: 527-1468

COMM: (661) 860-3014

NIPR: [jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)  
<[mailto:jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>  
<[mailto:jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>

From: Hill, Shannan <Shannan.Hill@tetrattech.com  
<<mailto:Shannan.Hill@tetrattech.com>> >  
Sent: Monday, April 18, 2022 3:28 PM  
To: THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil)  
<<mailto:maung.thein.ctr@us.af.mil>> >; VAN NORDEN, JEANETTE L NH-03 USAF AFMC  
412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)  
<[mailto:jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)> >; Alberthal, Mike  
<[Mike.Alberthal@tetrattech.com](mailto:Mike.Alberthal@tetrattech.com) <<mailto:Mike.Alberthal@tetrattech.com>> >; HILL,  
SHANNAN M CTR USAF AFMC 412 CEG/CEVC <[shannan.hill.ctr@us.af.mil](mailto:shannan.hill.ctr@us.af.mil)  
<<mailto:shannan.hill.ctr@us.af.mil>> >; SOLIZ, SHARON M CTR USAF AFMC 412  
CEG/CEVC <[sharon.soliz.ctr@us.af.mil](mailto:sharon.soliz.ctr@us.af.mil) <<mailto:sharon.soliz.ctr@us.af.mil>> >;  
Scott Spesshardt <[sspesshardt@eqm.com](mailto:sspesshardt@eqm.com) <<mailto:sspesshardt@eqm.com>> >  
Cc: Maskrey, Laura <LAURA.MASKREY@tetrattech.com  
<<mailto:LAURA.MASKREY@tetrattech.com>> >  
Subject: [Non-DoD Source] RE: Reminder: Response Requested: TRI Data Quality  
Questions due April 29

No. I have no idea. If you look below, the comment is from an EPA contractor. I don't have anything except this email.

From: THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil)> >  
<<mailto:maung.thein.ctr@us.af.mil>> >  
Sent: Monday, April 18, 2022 3:16 PM  
To: Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>  
<<mailto:Shannan.Hill@tetrattech.com>> >; VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>  
<[mailto:jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)> >; Alberthal, Mike  
<[Mike.Alberthal@tetrattech.com](mailto:Mike.Alberthal@tetrattech.com) <<mailto:Mike.Alberthal@tetrattech.com>> > >; Hill, Shannan <[shannan.hill.ctr@us.af.mil](mailto:shannan.hill.ctr@us.af.mil) <<mailto:shannan.hill.ctr@us.af.mil>> > >; SOLIZ, SHARON M CTR USAF AFMC 412 CEG/CEVC <[sharon.soliz.ctr@us.af.mil](mailto:sharon.soliz.ctr@us.af.mil)>  
<<mailto:sharon.soliz.ctr@us.af.mil>> > >; Scott Spesshardt <[sspesshardt@eqm.com](mailto:sspesshardt@eqm.com)>  
<<mailto:sspesshardt@eqm.com>> >  
Cc: Maskrey, Laura <[LAURA.MASKREY@tetrattech.com](mailto:LAURA.MASKREY@tetrattech.com)>  
<<mailto:LAURA.MASKREY@tetrattech.com>> >  
Subject: RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Shannan,

Do you have the manifest IDs for those 5 shipments in question?

Maung Thein

Environmental Quality Management

EAFB Hazardous Waste Storage Facility

661-277-1436 - Desk

661-277-3681 - Main office

From: Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>  
<<mailto:Shannan.Hill@tetrattech.com>> >  
Sent: Monday, April 18, 2022 10:05 AM  
To: VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC  
<[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil) <[mailto:jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)> > >; Alberthal, Mike <[Mike.Alberthal@tetrattech.com](mailto:Mike.Alberthal@tetrattech.com)>  
<<mailto:Mike.Alberthal@tetrattech.com>> > >; HILL, SHANNAN M CTR USAF AFMC 412 CEG/CEVC <[shannan.hill.ctr@us.af.mil](mailto:shannan.hill.ctr@us.af.mil) <<mailto:shannan.hill.ctr@us.af.mil>> > >; THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil)>  
<<mailto:maung.thein.ctr@us.af.mil>> > >; SOLIZ, SHARON M CTR USAF AFMC 412 CEG/CEVC <[sharon.soliz.ctr@us.af.mil](mailto:sharon.soliz.ctr@us.af.mil) <<mailto:sharon.soliz.ctr@us.af.mil>> > >; Scott Spesshardt <[sspesshardt@eqm.com](mailto:sspesshardt@eqm.com) <<mailto:sspesshardt@eqm.com>> > >  
Cc: Maskrey, Laura <[LAURA.MASKREY@tetrattech.com](mailto:LAURA.MASKREY@tetrattech.com)>  
<<mailto:LAURA.MASKREY@tetrattech.com>> >  
Subject: [Non-DoD Source] RE: Reminder: Response Requested: TRI Data Quality Questions due April 29  
Jeanette,

I am attaching our work on TRI hazardous waste from 2020. This spreadsheet takes what I get from HWSF and adds our calculations based upon the waste profiles for each item. You can see where I applied a percentage of benzene based upon the data supplied. I have no idea where they are getting the amount of waste with benzene. The email below says that

It appears your facility has sent approximately 5 shipments (sub e-Manifest IDs) totaling 160,075 pounds of hazardous waste listed containing Benzene to offsite location(s) for reporting year 2020,.

I don't see this in my spreadsheet. I see 112 pounds of benzene. Let's loop in Haz waste. Maybe they can help us figure this out!

From: VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC  
<[jeanette.n\\_norden.1@us.af.mil](mailto:jeanette.n_norden.1@us.af.mil) <[mailto:jeanette.n\\_norden.1@us.af.mil](mailto:jeanette.n_norden.1@us.af.mil)> >  
Sent: Monday, April 18, 2022 8:15 AM  
To: Alberthal, Mike <[Mike.Alberthal@tetrattech.com](mailto:Mike.Alberthal@tetrattech.com)> >; Hill, Shannan  
<[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com) <<mailto:Shannan.Hill@tetrattech.com>> >; Hill,  
Shannan <[shannan.hill.ctr@us.af.mil](mailto:shannan.hill.ctr@us.af.mil) <<mailto:shannan.hill.ctr@us.af.mil>> >  
Subject: FW: Reminder: Response Requested: TRI Data Quality Questions due April 29  
Importance: High

Is this something you guys could do?

Jeanette

From: MINNECI, MARC G NH-04 USAF AFMC 412 CEG/CEVC <[marc.minneci.1@us.af.mil](mailto:marc.minneci.1@us.af.mil)> <<mailto:marc.minneci.1@us.af.mil>> >  
Sent: Thursday, April 14, 2022 1:20 PM  
To: VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC  
<[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil) <[mailto:jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)> >  
Subject: FW: Reminder: Response Requested: TRI Data Quality Questions due April 29  
Importance: High

Jeanette,

Got this inquiry below from a contractor supporting EPA regarding our TRI submission for 2020.

Please see email below (focus on yellow highlight)

Please review the inquiry and provide an answer back to be as soon as possible.

Thanks,

Marc

MARC G. MINNECI, M.S. Env. E., NH-0819-04 (GS-14), DAF

Acting Chief, Environmental Management Division

412 Civil Engineer Group

120 N. Rosamond Blvd, Ste. A

Edwards AFB CA 93524

DSN: 527-1478

COMM: (661) 277-1478

NIPR: <<mailto:marc.minneci.1@us.af.mil>> [marc.minneci.1@us.af.mil](mailto:marc.minneci.1@us.af.mil)

From: Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com) <<mailto:Abby.Burton@erg.com>> >

Sent: Thursday, April 14, 2022 12:19 PM

To: HATCH, GARY L NH-03 USAF AFMC 412 TW/PA <[gary.hatch@us.af.mil](mailto:gary.hatch@us.af.mil)> <<mailto:gary.hatch@us.af.mil>> >; MINNECI, MARC G NH-04 USAF AFMC 412 CEG/CEVC <[marc.minneci.1@us.af.mil](mailto:marc.minneci.1@us.af.mil) <<mailto:marc.minneci.1@us.af.mil>> >

Subject: [Non-DoD Source] Reminder: Response Requested: TRI Data Quality Questions due April 29

Hello,

This is a reminder that EPA is requesting your response to the following Toxics Release Inventory data quality question. Even if you believe the data in question is correct and no changes are required, please fill out the survey linked below so this issue can be considered resolved.

Thank you for your cooperation.

Sincerely,

Abby Burton

ERG (EPA Contractor) on behalf of EPA Region 9

From: [abby.burton@erg.com](mailto:abby.burton@erg.com) <<mailto:abby.burton@erg.com>> <[abby.burton@erg.com](mailto:abby.burton@erg.com)> <<mailto:abby.burton@erg.com>> >

Sent: Tuesday, March 29, 2022 9:59 AM

To: [GARY.HATCH@US.AF.MIL](mailto:GARY.HATCH@US.AF.MIL) <<mailto:GARY.HATCH@US.AF.MIL>> ; Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com) <<mailto:Abby.Burton@erg.com>> >; [MARC.MINNECI.1@US.AF.MIL](mailto:MARC.MINNECI.1@US.AF.MIL) <<mailto:MARC.MINNECI.1@US.AF.MIL>>

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF EDWARDS AFB CA) (TRIFID: 93524RFRCF1SROS)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF EDWARDS

AFB CA) (TRIFID: 93524RFRCF1SROS)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

Tue Mar 29 13:53:01 UTC 2022

Dear MARC MINNECI and GARY HATCH:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

The Form R for Benzene submitted to EPA from your facility: US DOD USAF EDWARDS AFB CA - (TRIFID: 93524RFRCF1SROS) for reporting year(s) 2020 has been identified for follow-up due to the following:

#### Reporting Year 2020

\* It appears your facility has sent approximately 5 shipments (sub e-Manifest IDs) totaling 160,075 pounds of hazardous waste listed containing Benzene to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Benzene for reporting year 2020. Could you please review your calculations and submit a new report for Benzene for reporting year 2020, if needed.

\* Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pf\\_as\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pf_as_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 5 hazardous waste shipments (some e-Manifest #s: 5) totaling 123,320 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

#### ***How do I respond to this inquiry? (Step 1 is always required)***

##### *Step 1:*

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=0b5e7fe7-b271-48f1-bcef-a0e1a777ddb1&target=4aa3c2c1-626b-4842-af18-5fadf338395a>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

*Step 2:*

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

## **EPA Contractor Email – OG-6**

**From:** Abby Burton

**Sent:** Wednesday, April 20, 2022 4:56 PM

**To:** VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <jeanette.van\_norden.1@us.af.mil>; THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <maung.thein.ctr@us.af.mil>

**Cc:** Hill, Shannan <Shannan.Hill@tetrattech.com>; SILVA, JOSEFA L NH-03 USAF AFMC 412 CEG/CEVC <josefa.silva.1@us.af.mil>

**Subject:** RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Hi Jeanette,

Unfortunately I don't have the PFAS manifest information readily available. I'll see if I can get it and will send it along ASAP.

Abby Burton | **ERG (EPA Contractor)** | 908.251.7161 (mobile) | she/her/hers

**From:** VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>

**Sent:** Wednesday, April 20, 2022 2:08 PM

**To:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>; THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil)>

**Cc:** Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>; SILVA, JOSEFA L NH-03 USAF AFMC 412 CEG/CEVC <[josefa.silva.1@us.af.mil](mailto:josefa.silva.1@us.af.mil)>

**Subject:** RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Abby,

Did you have this information for the 5 PFAS manifests as well? Thank you.

Jeanette

JEANETTE L. VAN NORDEN, NH-03, DAF

Hazardous Material Program Manager

Environmental Management Division

412 Civil Engineer Group

120 N. Rosamond Blvd, Ste. A

Edwards AFB CA 93524

DSN: 527-1468

COMM: (661) 860-3014

NIPR: [jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil) <[mailto:jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>

**From:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>

**Sent:** Wednesday, April 20, 2022 7:07 AM

**To:** THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil)>

**Cc:** Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>; VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>; SILVA, JOSEFA L NH-03 USAF AFMC 412 CEG/CEVC <[josefa.silva.1@us.af.mil](mailto:josefa.silva.1@us.af.mil)>

**Subject:** [URL Verdict: Unknown][Non-DoD Source] RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Attached is the information I have on these shipments. Note:

The "sub-manifest ID" is identifying the waste line on the e-manifest and is the e-manifest ID + 1-digit line number

The hazardous waste quantities are the entire shipment weights, and the weight of benzene in the waste may be lower.

Best,

Abby

Abby Burton | **ERG (EPA Contractor)** | 908.251.7161 (mobile) | she/her/hers

**From:** THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil)>  
**Sent:** Tuesday, April 19, 2022 6:47 PM  
**To:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>  
**Cc:** Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>; VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>; SILVA, JOSEFA L NH-03 USAF AFMC 412 CEG/CEVC <[josefa.silva.1@us.af.mil](mailto:josefa.silva.1@us.af.mil)>  
**Subject:** FW: Reminder: Response Requested: TRI Data Quality Questions due April 29

Hi Abby,

Do you have a list of the 5 manifests that EPA is indicating that Edwards AFB shipped 160,075 Lb. of waste containing benzene in 2020?

Maung Thein

Environmental Quality Management

EAFB Hazardous Waste Storage Facility

661-277-1436 - Desk

661-277-3681 - Main office

**From:** SILVA, JOSEFA L NH-03 USAF AFMC 412 CEG/CEVC <[josefa.silva.1@us.af.mil](mailto:josefa.silva.1@us.af.mil)>  
**Sent:** Tuesday, April 19, 2022 3:21 PM  
**To:** VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>; Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>; THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil)>; Alberthal, Mike <[Mike.Alberthal@tetrattech.com](mailto:Mike.Alberthal@tetrattech.com)>; HILL, SHANNAN M CTR USAF AFMC 412 CEG/CEVC <[shannan.hill.ctr@us.af.mil](mailto:shannan.hill.ctr@us.af.mil)>; SOLIZ, SHARON M CTR USAF AFMC 412 CEG/CEVC <[sharon.soliz.ctr@us.af.mil](mailto:sharon.soliz.ctr@us.af.mil)>; Scott Spesshardt <[sspesshardt@eqm.com](mailto:sspesshardt@eqm.com)>  
**Cc:** Maskrey, Laura <[LAURA.MASKREY@tetrattech.com](mailto:LAURA.MASKREY@tetrattech.com)>; WEBER, JENNIFER A NH-02 USAF AFMC 412 CEG/CEVC <[jennifer.weber.2@us.af.mil](mailto:jennifer.weber.2@us.af.mil)>  
**Subject:** RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Hi,

Would anyone have the five manifest in question? This way we can take a look at what exactly was noted in the manifest.

Josie

*Josefa L. Silva*

*Water Quality/POL Tanks Program Manager*

*412th Civil Engineer Group*

*120 N. Rosamond Boulevard*

*Edwards AFB, CA 93524*

Office: 661-277-9223

Fax: 661-275-2417

**From:** VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>  
**Sent:** Tuesday, April 19, 2022 1:40 PM  
**To:** Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>; THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil)>; Alberthal, Mike <[Mike.Alberthal@tetrattech.com](mailto:Mike.Alberthal@tetrattech.com)>; HILL, SHANNAN M CTR USAF AFMC 412 CEG/CEVC <[shannan.hill.ctr@us.af.mil](mailto:shannan.hill.ctr@us.af.mil)>; SOLIZ, SHARON M CTR USAF AFMC 412 CEG/CEVC <[sharon.soliz.ctr@us.af.mil](mailto:sharon.soliz.ctr@us.af.mil)>; Scott Spesshardt <[sspesshardt@eqm.com](mailto:sspesshardt@eqm.com)>  
**Cc:** Maskrey, Laura <[LAURA.MASKREY@tetrattech.com](mailto:LAURA.MASKREY@tetrattech.com)>; WEBER, JENNIFER A NH-02 USAF AFMC 412 CEG/CEVC <[jennifer.weber.2@us.af.mil](mailto:jennifer.weber.2@us.af.mil)>; SILVA, JOSEFA L NH-03 USAF AFMC 412 CEG/CEVC <[josefa.silva.1@us.af.mil](mailto:josefa.silva.1@us.af.mil)>  
**Subject:** RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Any ideas on how I should respond? I'm thinking that these items were either spills or exempt from reporting. It appears that I have to fill out a questionnaire or something, but it would probably be good to know what I should say before I start filling anything out. Maybe Josie would know if there was a spill that caused these disposals?

Jeanette

JEANETTE L. VAN NORDEN, NH-03, DAF

Hazardous Material Program Manager

Environmental Management Division

412 Civil Engineer Group

120 N. Rosamond Blvd, Ste. A

Edwards AFB CA 93524

DSN: 527-1468

COMM: (661) 860-3014

NIPR: [jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil) <[mailto:jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>

**From:** Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>  
**Sent:** Monday, April 18, 2022 3:28 PM  
**To:** THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil)>; VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>; Alberthal, Mike <[Mike.Alberthal@tetrattech.com](mailto:Mike.Alberthal@tetrattech.com)>; HILL, SHANNAN M CTR USAF AFMC 412 CEG/CEVC <[shannan.hill.ctr@us.af.mil](mailto:shannan.hill.ctr@us.af.mil)>; SOLIZ, SHARON M CTR USAF AFMC 412 CEG/CEVC <[sharon.soliz.ctr@us.af.mil](mailto:sharon.soliz.ctr@us.af.mil)>; Scott Spesshardt <[sspesshardt@eqm.com](mailto:sspesshardt@eqm.com)>  
**Cc:** Maskrey, Laura <[LAURA.MASKREY@tetrattech.com](mailto:LAURA.MASKREY@tetrattech.com)>  
**Subject:** [Non-DoD Source] RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

No. I have no idea. If you look below, the comment is from an EPA contractor. I don't have anything except this email.

**From:** THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil)>

**Sent:** Monday, April 18, 2022 3:16 PM

**To:** Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>; VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>; Alberthal, Mike <[Mike.Alberthal@tetrattech.com](mailto:Mike.Alberthal@tetrattech.com)>; Hill, Shannan <[shannan.hill.ctr@us.af.mil](mailto:shannan.hill.ctr@us.af.mil)>; SOLIZ, SHARON M CTR USAF AFMC 412 CEG/CEVC <[sharon.soliz.ctr@us.af.mil](mailto:sharon.soliz.ctr@us.af.mil)>; Scott Spesshardt <[sspesshardt@eqm.com](mailto:sspesshardt@eqm.com)>

**Cc:** Maskrey, Laura <[LAURA.MASKREY@tetrattech.com](mailto:LAURA.MASKREY@tetrattech.com)>

**Subject:** RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Shannan,

Do you have the manifest IDs for those 5 shipments in question?

Maung Thein

Environmental Quality Management

EAFB Hazardous Waste Storage Facility

661-277-1436 - Desk

661-277-3681 - Main office

**From:** Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>

**Sent:** Monday, April 18, 2022 10:05 AM

**To:** VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>; Alberthal, Mike <[Mike.Alberthal@tetrattech.com](mailto:Mike.Alberthal@tetrattech.com)>; HILL, SHANNAN M CTR USAF AFMC 412 CEG/CEVC <[shannan.hill.ctr@us.af.mil](mailto:shannan.hill.ctr@us.af.mil)>; THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil)>; SOLIZ, SHARON M CTR USAF AFMC 412 CEG/CEVC <[sharon.soliz.ctr@us.af.mil](mailto:sharon.soliz.ctr@us.af.mil)>; Scott Spesshardt <[sspesshardt@eqm.com](mailto:sspesshardt@eqm.com)>

**Cc:** Maskrey, Laura <[LAURA.MASKREY@tetrattech.com](mailto:LAURA.MASKREY@tetrattech.com)>

**Subject:** [Non-DoD Source] RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Jeanette,

I am attaching our work on TRI hazardous waste from 2020. This spreadsheet takes what I get from HWSF and adds our calculations based upon the waste profiles for each item. You can see where I applied a percentage of benzene based upon the data supplied. I have no idea where they are getting the amount of waste with benzene. The email below says that

It appears your facility has sent approximately 5 shipments (sub e-Manifest IDs) totaling 160,075 pounds of hazardous waste listed containing Benzene to offsite location(s) for reporting year 2020.

I don't see this in my spreadsheet. I see 112 pounds of benzene. Let's loop in Haz waste. Maybe they can help us figure this out!

**From:** VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.n\\_norden.1@us.af.mil](mailto:jeanette.n_norden.1@us.af.mil)>

**Sent:** Monday, April 18, 2022 8:15 AM

**To:** Alberthal, Mike <[Mike.Alberthal@tetrattech.com](mailto:Mike.Alberthal@tetrattech.com)>; Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>; Hill, Shannan

<[shannan.hill.ctr@us.af.mil](mailto:shannan.hill.ctr@us.af.mil)>

**Subject:** FW: Reminder: Response Requested: TRI Data Quality Questions due April 29

**Importance:** High

Is this something you guys could do?

Jeanette

**From:** MINNECI, MARC G NH-04 USAF AFMC 412 CEG/CEVC <[marc.minneci.1@us.af.mil](mailto:marc.minneci.1@us.af.mil)>

**Sent:** Thursday, April 14, 2022 1:20 PM

**To:** VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>

**Subject:** FW: Reminder: Response Requested: TRI Data Quality Questions due April 29

**Importance:** High

Jeanette,

Got this inquiry below from a contractor supporting EPA regarding our TRI submission for 2020.

Please see email below (focus on yellow highlight)

Please review the inquiry and provide an answer back to be as soon as possible.

Thanks,

Marc

**MARC G. MINNECI, M.S. Env. E., NH-0819-04 (GS-14), DAF**

Acting Chief, Environmental Management Division

412 Civil Engineer Group

120 N. Rosamond Blvd, Ste. A

Edwards AFB CA 93524

DSN: 527-1478

COMM: (661) 277-1478

NIPR: [marc.minneci.1@us.af.mil](mailto:marc.minneci.1@us.af.mil)

**From:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>

**Sent:** Thursday, April 14, 2022 12:19 PM

**To:** HATCH, GARY L NH-03 USAF AFMC 412 TW/PA <[gary.hatch@us.af.mil](mailto:gary.hatch@us.af.mil)>; MINNECI, MARC G NH-04 USAF AFMC 412 CEG/CEVC <[marc.minneci.1@us.af.mil](mailto:marc.minneci.1@us.af.mil)>

**Subject:** [Non-DoD Source] Reminder: Response Requested: TRI Data Quality Questions due April 29

Hello,

This is a reminder that EPA is requesting your response to the following Toxics Release Inventory data quality question. Even if you believe the data in question is correct and no changes are required, please fill out the survey linked below so this issue can be considered resolved.

Thank you for your cooperation.

Sincerely,

Abby Burton

**ERG (EPA Contractor) on behalf of** EPA Region 9

**From:** [abby.burton@erg.com](mailto:abby.burton@erg.com) <[abby.burton@erg.com](mailto:abby.burton@erg.com)>

**Sent:** Tuesday, March 29, 2022 9:59 AM

**To:** [GARY.HATCH@US.AF.MIL](mailto:GARY.HATCH@US.AF.MIL); Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>; [MARC.MINNECI.1@US.AF.MIL](mailto:MARC.MINNECI.1@US.AF.MIL)

**Subject:** Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF EDWARDS AFB CA) (TRIFID: 93524RFRCF1SROS)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF EDWARDS AFB CA) (TRIFID: 93524RFRCF1SROS)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 29 13:53:01 UTC 2022

Dear MARC MINNECI and GARY HATCH:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Benzene submitted to EPA from your facility: *US DOD USAF EDWARDS AFB CA - (TRIFID: 93524RFRCF1SROS)* for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- It appears your facility has sent approximately 5 shipments (sub e-Manifest IDs) totaling 160,075 pounds of hazardous waste listed containing Benzene to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Benzene for reporting year 2020. Could you please review your calculations and submit a new report for Benzene for reporting year 2020, if needed.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 5 hazardous waste shipments (some e-Manifest #s: 5) totaling 123,320 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=0b5e7fe7-b271-48f1-bcef-a0e1a777ddb1&target=4aa3c2c1-626b-4842-af18-5fadf338395a>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

**EPA Contractor Email – OG-6**

**From:** Senthil, Velu <Senthil.Velu@epa.gov>

**Sent:** Thursday, April 21, 2022 5:39 PM

**To:** Abby Burton <Abby.Burton@erg.com>

**Cc:** Cheryl Keenan <Cheryl.Keenan@erg.com>; Sylls, Gene <Sylls.Gene@epa.gov>; Senthil, Velu <Senthil.Velu@epa.gov>

**Subject:** RE: PFAS data for ad hoc DQ checks

Hi Abby,

You are right.... I couldn't find it also.

some mix-up.....

Please resolve this error code and thanks.

Velu Senthil

(Ponoun: he, his)

202-566-0749

**From:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>  
**Sent:** Thursday, April 21, 2022 2:32 PM  
**To:** Senthil, Velu <[Senthil.Velu@epa.gov](mailto:Senthil.Velu@epa.gov)>  
**Cc:** Cheryl Keenan <[cheryl.keenan@erg.com](mailto:cheryl.keenan@erg.com)>; Sylls, Gene <[Sylls.Gene@epa.gov](mailto:Sylls.Gene@epa.gov)>  
**Subject:** RE: PFAS data for ad hoc DQ checks

Thanks, TRIFID is 93524RFRCF1SROS (US DOD USAF EDWARDS AFB CA), they're flagged for 5 shipments totaling 123,320 pounds of PFAS.

Abby Burton | [ERG](#) | 908.251.7161 (mobile) | she/her/hers

**From:** Senthil, Velu <[Senthil.Velu@epa.gov](mailto:Senthil.Velu@epa.gov)>  
**Sent:** Thursday, April 21, 2022 12:58 PM  
**To:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>  
**Cc:** Cheryl Keenan <[Cheryl.Keenan@erg.com](mailto:Cheryl.Keenan@erg.com)>; Sylls, Gene <[Sylls.Gene@epa.gov](mailto:Sylls.Gene@epa.gov)>; Senthil, Velu <[Senthil.Velu@epa.gov](mailto:Senthil.Velu@epa.gov)>  
**Subject:** RE: PFAS data for ad hoc DQ checks

Hi Abby,

Sure, can you please send me the facility information?

Thanks

Velu Senthil

(Ponoun: he, his)

202-566-0749

**From:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>  
**Sent:** Thursday, April 21, 2022 11:20 AM  
**To:** Senthil, Velu <[Senthil.Velu@epa.gov](mailto:Senthil.Velu@epa.gov)>  
**Cc:** Cheryl Keenan <[cheryl.keenan@erg.com](mailto:cheryl.keenan@erg.com)>; Sylls, Gene <[Sylls.Gene@epa.gov](mailto:Sylls.Gene@epa.gov)>  
**Subject:** PFAS data for ad hoc DQ checks

Hi Velu,

I have a facility in the Ad Hoc data quality review that is flagged as a potential PFAS non-reporter. They're asking for more information about the e-manifest shipments EPA identified as containing PFAS. I don't see any information on the PFAS shipments in the files you posted to QuEST. Would you be able to provide that data?

Thanks,

Abby

Abby Burton | [ERG](#) | 908.251.7161 (mobile) | she/her/hers

**From:** VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>

**Sent:** Wednesday, April 20, 2022 4:58 PM

**To:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>; THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil)>

**Cc:** Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>; SILVA, JOSEFA L NH-03 USAF AFMC 412 CEG/CEVC <[josefa.silva.1@us.af.mil](mailto:josefa.silva.1@us.af.mil)>

**Subject:** RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Abby,

Thank you very much!! We will be standing by.

Jeanette

JEANETTE L. VAN NORDEN, NH-03, DAF

Hazardous Material Program Manager

Environmental Management Division

412 Civil Engineer Group

120 N. Rosamond Blvd, Ste. A

Edwards AFB CA 93524

DSN: 527-1468

COMM: (661) 860-3014

NIPR: [jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil) <[mailto:jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>

**From:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>

**Sent:** Wednesday, April 20, 2022 1:56 PM

**To:** VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>; THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil)>

**Cc:** Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>; SILVA, JOSEFA L NH-03 USAF AFMC 412 CEG/CEVC <[josefa.silva.1@us.af.mil](mailto:josefa.silva.1@us.af.mil)>

**Subject:** [Non-DoD Source] RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Hi Jeanette,

Unfortunately I don't have the PFAS manifest information readily available. I'll see if I can get it and will send it along ASAP.

Abby Burton | [ERG \(EPA Contractor\)](#) | 908.251.7161 (mobile) | she/her/hers

**From:** VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>

**Sent:** Wednesday, April 20, 2022 2:08 PM

**To:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>; THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil)>

**Cc:** Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>; SILVA, JOSEFA L NH-03 USAF AFMC 412 CEG/CEVC <[josefa.silva.1@us.af.mil](mailto:josefa.silva.1@us.af.mil)>

**Subject:** RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Abby,

Did you have this information for the 5 PFAS manifests as well? Thank you.

Jeanette

JEANETTE L. VAN NORDEN, NH-03, DAF

Hazardous Material Program Manager

Environmental Management Division

412 Civil Engineer Group

120 N. Rosamond Blvd, Ste. A

Edwards AFB CA 93524

DSN: 527-1468

COMM: (661) 860-3014

NIPR: [jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil) <[mailto:jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>

**From:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>

**Sent:** Wednesday, April 20, 2022 7:07 AM

**To:** THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil)>

**Cc:** Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>; VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>; SILVA, JOSEFA L NH-03 USAF AFMC 412 CEG/CEVC <[josefa.silva.1@us.af.mil](mailto:josefa.silva.1@us.af.mil)>

**Subject:** [URL Verdict: Unknown][Non-DoD Source] RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Attached is the information I have on these shipments. Note:

The "sub-manifest ID" is identifying the waste line on the e-manifest and is the e-manifest ID + 1-digit line number

The hazardous waste quantities are the entire shipment weights, and the weight of benzene in the waste may be lower.

Best,  
Abby

Abby Burton | **ERG (EPA Contractor)** | 908.251.7161 (mobile) | she/her/hers

**From:** THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil)>  
**Sent:** Tuesday, April 19, 2022 6:47 PM  
**To:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>  
**Cc:** Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>; VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>; SILVA, JOSEFA L NH-03 USAF AFMC 412 CEG/CEVC <[josefa.silva.1@us.af.mil](mailto:josefa.silva.1@us.af.mil)>  
**Subject:** FW: Reminder: Response Requested: TRI Data Quality Questions due April 29

Hi Abby,

Do you have a list of the 5 manifests that EPA is indicating that Edwards AFB shipped 160,075 Lb. of waste containing benzene in 2020?

Maung Thein

Environmental Quality Management

EAFB Hazardous Waste Storage Facility

661-277-1436 - Desk

661-277-3681 - Main office

**From:** SILVA, JOSEFA L NH-03 USAF AFMC 412 CEG/CEVC <[josefa.silva.1@us.af.mil](mailto:josefa.silva.1@us.af.mil)>  
**Sent:** Tuesday, April 19, 2022 3:21 PM  
**To:** VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>; Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>; THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil)>; Alberthal, Mike <[Mike.Alberthal@tetrattech.com](mailto:Mike.Alberthal@tetrattech.com)>; HILL, SHANNAN M CTR USAF AFMC 412 CEG/CEVC <[shannan.hill.ctr@us.af.mil](mailto:shannan.hill.ctr@us.af.mil)>; SOLIZ, SHARON M CTR USAF AFMC 412 CEG/CEVC <[sharon.soliz.ctr@us.af.mil](mailto:sharon.soliz.ctr@us.af.mil)>; Scott Spesshardt <[sspesshardt@eqm.com](mailto:sspesshardt@eqm.com)>  
**Cc:** Maskrey, Laura <[LAURA.MASKREY@tetrattech.com](mailto:LAURA.MASKREY@tetrattech.com)>; WEBER, JENNIFER A NH-02 USAF AFMC 412 CEG/CEVC <[jennifer.weber.2@us.af.mil](mailto:jennifer.weber.2@us.af.mil)>  
**Subject:** RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Hi,

Would anyone have the five manifest in question? This way we can take a look at what exactly was noted in the manifest.

Josie

*Josefa L. Silva*

*Water Quality/POL Tanks Program Manager*

*412th Civil Engineer Group*

*120 N. Rosamond Boulevard*

*Edwards AFB, CA 93524*

*Office: 661-277-9223*

*Fax: 661-275-2417*

**From:** VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>  
**Sent:** Tuesday, April 19, 2022 1:40 PM  
**To:** Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>; THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil)>; Alberthal, Mike <[Mike.Alberthal@tetrattech.com](mailto:Mike.Alberthal@tetrattech.com)>; HILL, SHANNAN M CTR USAF AFMC 412 CEG/CEVC <[shannan.hill.ctr@us.af.mil](mailto:shannan.hill.ctr@us.af.mil)>; SOLIZ, SHARON M CTR USAF AFMC 412 CEG/CEVC <[sharon.soliz.ctr@us.af.mil](mailto:sharon.soliz.ctr@us.af.mil)>; Scott Spesshardt <[sspesshardt@eqm.com](mailto:sspesshardt@eqm.com)>  
**Cc:** Maskrey, Laura <[LAURA.MASKREY@tetrattech.com](mailto:LAURA.MASKREY@tetrattech.com)>; WEBER, JENNIFER A NH-02 USAF AFMC 412 CEG/CEVC <[jennifer.weber.2@us.af.mil](mailto:jennifer.weber.2@us.af.mil)>; SILVA, JOSEFA L NH-03 USAF AFMC 412 CEG/CEVC <[josefa.silva.1@us.af.mil](mailto:josefa.silva.1@us.af.mil)>  
**Subject:** RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Any ideas on how I should respond? I'm thinking that these items were either spills or exempt from reporting. It appears that I have to fill out a questionnaire or something, but it would probably be good to know what I should say before I start filling anything out. Maybe Josie would know if there was a spill that caused these disposals?

Jeanette

JEANETTE L. VAN NORDEN, NH-03, DAF

Hazardous Material Program Manager

Environmental Management Division

412 Civil Engineer Group

120 N. Rosamond Blvd, Ste. A

Edwards AFB CA 93524

DSN: 527-1468

COMM: (661) 860-3014

NIPR: [jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil) <[mailto:jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>

**From:** Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>  
**Sent:** Monday, April 18, 2022 3:28 PM  
**To:** THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil)>; VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>; Alberthal, Mike <[Mike.Alberthal@tetrattech.com](mailto:Mike.Alberthal@tetrattech.com)>; HILL, SHANNAN M CTR USAF AFMC 412 CEG/CEVC <[shannan.hill.ctr@us.af.mil](mailto:shannan.hill.ctr@us.af.mil)>; SOLIZ, SHARON M CTR USAF AFMC 412 CEG/CEVC <[sharon.soliz.ctr@us.af.mil](mailto:sharon.soliz.ctr@us.af.mil)>; Scott Spesshardt <[sspesshardt@eqm.com](mailto:sspesshardt@eqm.com)>  
**Cc:** Maskrey, Laura <[LAURA.MASKREY@tetrattech.com](mailto:LAURA.MASKREY@tetrattech.com)>  
**Subject:** [Non-DoD Source] RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

No. I have no idea. If you look below, the comment is from an EPA contractor. I don't have anything except this email.

**From:** THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil)>  
**Sent:** Monday, April 18, 2022 3:16 PM  
**To:** Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>; VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>; Alberthal, Mike <[Mike.Alberthal@tetrattech.com](mailto:Mike.Alberthal@tetrattech.com)>; Hill, Shannan <[shannan.hill.ctr@us.af.mil](mailto:shannan.hill.ctr@us.af.mil)>; SOLIZ, SHARON M CTR USAF AFMC 412 CEG/CEVC <[sharon.soliz.ctr@us.af.mil](mailto:sharon.soliz.ctr@us.af.mil)>; Scott Spesshardt <[sspesshardt@eqm.com](mailto:sspesshardt@eqm.com)>  
**Cc:** Maskrey, Laura <[LAURA.MASKREY@tetrattech.com](mailto:LAURA.MASKREY@tetrattech.com)>  
**Subject:** RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Shannan,

Do you have the manifest IDs for those 5 shipments in question?

Maung Thein

Environmental Quality Management

EAFB Hazardous Waste Storage Facility

661-277-1436 - Desk

661-277-3681 - Main office

**From:** Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>  
**Sent:** Monday, April 18, 2022 10:05 AM  
**To:** VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>; Alberthal, Mike <[Mike.Alberthal@tetrattech.com](mailto:Mike.Alberthal@tetrattech.com)>; HILL, SHANNAN M CTR USAF AFMC 412 CEG/CEVC <[shannan.hill.ctr@us.af.mil](mailto:shannan.hill.ctr@us.af.mil)>; THEIN, MAUNG M CTR USAF AFMC 412 CEG/CEVC <[maung.thein.ctr@us.af.mil](mailto:maung.thein.ctr@us.af.mil)>; SOLIZ, SHARON M CTR USAF AFMC 412 CEG/CEVC <[sharon.soliz.ctr@us.af.mil](mailto:sharon.soliz.ctr@us.af.mil)>; Scott Spesshardt <[sspesshardt@eqm.com](mailto:sspesshardt@eqm.com)>  
**Cc:** Maskrey, Laura <[LAURA.MASKREY@tetrattech.com](mailto:LAURA.MASKREY@tetrattech.com)>  
**Subject:** [Non-DoD Source] RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Jeanette,

I am attaching our work on TRI hazardous waste from 2020. This spreadsheet takes what I get from HWSF and adds our calculations based upon the waste profiles for each item. You can see where I applied a percentage of benzene based upon the data supplied. I have no idea where they are getting the amount of waste with benzene. The email below says that

It appears your facility has sent approximately 5 shipments (sub e-Manifest IDs) totaling 160,075 pounds of hazardous waste listed containing Benzene to offsite location(s) for reporting year 2020,.

I don't see this in my spreadsheet. I see 112 pounds of benzene. Let's loop in Haz waste. Maybe they can help us figure this out!

**From:** VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.n\\_norden.1@us.af.mil](mailto:jeanette.n_norden.1@us.af.mil)>  
**Sent:** Monday, April 18, 2022 8:15 AM  
**To:** Alberthal, Mike <[Mike.Alberthal@tetrattech.com](mailto:Mike.Alberthal@tetrattech.com)>; Hill, Shannan <[Shannan.Hill@tetrattech.com](mailto:Shannan.Hill@tetrattech.com)>; Hill, Shannan <[shannan.hill.ctr@us.af.mil](mailto:shannan.hill.ctr@us.af.mil)>

**Subject:** FW: Reminder: Response Requested: TRI Data Quality Questions due April 29  
**Importance:** High

Is this something you guys could do?

Jeanette

**From:** MINNECI, MARC G NH-04 USAF AFMC 412 CEG/CEVC <[marc.minneci.1@us.af.mil](mailto:marc.minneci.1@us.af.mil)>  
**Sent:** Thursday, April 14, 2022 1:20 PM  
**To:** VAN NORDEN, JEANETTE L NH-03 USAF AFMC 412 CEG/CEVC <[jeanette.van\\_norden.1@us.af.mil](mailto:jeanette.van_norden.1@us.af.mil)>  
**Subject:** FW: Reminder: Response Requested: TRI Data Quality Questions due April 29  
**Importance:** High

Jeanette,

Got this inquiry below from a contractor supporting EPA regarding our TRI submission for 2020.

Please see email below (focus on yellow highlight)

Please review the inquiry and provide an answer back to be as soon as possible.

Thanks,

Marc

**MARC G. MINNECI, M.S. Env. E., NH-0819-04 (GS-14), DAF**

Acting Chief, Environmental Management Division

412 Civil Engineer Group

120 N. Rosamond Blvd, Ste. A

Edwards AFB CA 93524

DSN: 527-1478

COMM: (661) 277-1478

NIPR: [marc.minneci.1@us.af.mil](mailto:marc.minneci.1@us.af.mil)

**From:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>  
**Sent:** Thursday, April 14, 2022 12:19 PM  
**To:** HATCH, GARY L NH-03 USAF AFMC 412 TW/PA <[gary.hatch@us.af.mil](mailto:gary.hatch@us.af.mil)>; MINNECI, MARC G NH-04 USAF AFMC 412 CEG/CEVC <[marc.minneci.1@us.af.mil](mailto:marc.minneci.1@us.af.mil)>  
**Subject:** [Non-DoD Source] Reminder: Response Requested: TRI Data Quality Questions due April 29

Hello,

This is a reminder that EPA is requesting your response to the following Toxics Release Inventory data quality question. Even if you believe the data in question is correct and no changes are required, please fill out the survey linked below so this issue can be considered resolved.

Thank you for your cooperation.

Sincerely,

Abby Burton

**ERG (EPA Contractor) on behalf of** EPA Region 9

**From:** [abby.burton@erg.com](mailto:abby.burton@erg.com) <[abby.burton@erg.com](mailto:abby.burton@erg.com)>

**Sent:** Tuesday, March 29, 2022 9:59 AM

**To:** [GARY.HATCH@US.AF.MIL](mailto:GARY.HATCH@US.AF.MIL); Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>; [MARC.MINNECI.1@US.AF.MIL](mailto:MARC.MINNECI.1@US.AF.MIL)

**Subject:** Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF EDWARDS AFB CA) (TRIFID: 93524RFRCF1SROS)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF EDWARDS AFB CA) (TRIFID: 93524RFRCF1SROS)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 29 13:53:01 UTC 2022

Dear MARC MINNECI and GARY HATCH:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Benzene submitted to EPA from your facility: *US DOD USAF EDWARDS AFB CA - (TRIFID: 93524RFRCF1SROS)* for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- It appears your facility has sent approximately 5 shipments (sub e-Manifest IDs) totaling 160,075 pounds of hazardous waste listed containing Benzene to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Benzene for reporting year 2020. Could you please review your calculations and submit a new report for Benzene for reporting year 2020, if needed.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 5 hazardous waste shipments (some e-Manifest #: 5) totaling 123,320 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

Step 1:

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=0b5e7fe7-b271-48f1-bcef-a0e1a777ddb1&target=4aa3c2c1-626b-4842-af18-5fadf338395a>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

Step 2:

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

**From:** Abby Burton

**Sent:** Thursday, April 14, 2022 3:19 PM

**To:** GARY.HATCH@US.AF.MIL; MARC.MINNECI.1@US.AF.MIL

**Subject:** Reminder: Response Requested: TRI Data Quality Questions due April 29

Hello,

This is a reminder that EPA is requesting your response to the following Toxics Release Inventory data quality question. Even if you believe the data in question is correct and no changes are required, please fill out the survey linked below so this issue can be considered resolved.

Thank you for your cooperation.

Sincerely,

Abby Burton

**ERG (EPA Contractor) on behalf of** EPA Region 9

**From:** abby.burton@erg.com <abby.burton@erg.com>

**Sent:** Tuesday, March 29, 2022 9:59 AM

**To:** GARY.HATCH@US.AF.MIL; Abby Burton <Abby.Burton@erg.com>; MARC.MINNECI.1@US.AF.MIL

**Subject:** Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF EDWARDS AFB CA) (TRIFID: 93524RFRCF1SROS)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF EDWARDS AFB CA) (TRIFID: 93524RFRCF1SROS)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 29 13:53:01 UTC 2022

Dear MARC MINNECI and GARY HATCH:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Benzene submitted to EPA from your facility: *US DOD USAF EDWARDS AFB CA - (TRIFID: 93524RFRCF1SROS)* for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- It appears your facility has sent approximately 5 shipments (sub e-Manifest IDs) totaling 160,075 pounds of hazardous waste listed containing Benzene to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Benzene for reporting year 2020. Could you please review your calculations and submit a new report for Benzene for reporting year 2020, if needed.
- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 5 hazardous waste shipments (some e-Manifest #s: 5) totaling 123,320 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=0b5e7fe7-b271-48f1-bcef-a0e1a777ddb1&target=4aa3c2c1-626b-4842-af18-5fadf338395a>

**If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.**

Step 2:

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

## EPA Contractor Email – OG-7

Contractor Email

04/29/2022 04:04pm

From: *Abigail Burton*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To                     | E-Mail Address           |
|-----------------------------|--------------------------|
| Self: Abigail Burton        | abby.burton@erg.com      |
| Cc: eric.maresh.3@us.af.mil | eric.maresh.3@us.af.mil  |
| To: GARY HATCH              | GARY.HATCH@US.AF.MIL     |
| To: MARC MINNECI            | MARC.MINNECI.1@US.AF.MIL |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Region 9

Fri Apr 29 20:03:07 UTC 2022

Dear MARC MINNECI and GARY HATCH:

EPA would like to inform you that data quality issues raised for your facility [US DOD USAF EDWARDS AFB CA (TRIFID: 93524RFRCF1SROS)] during reporting year 2020 Adhoc Data Quality Checks are resolved for the following:

Reporting Year(s) Chemicals

2020 Benzene

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Abigail Burton

***ERG (EPA Contractor) on behalf of***

TRI Data Quality Program

US EPA

Region 9

**Email sent on 04/29/2022 07:13pm**

US DOD USAF EDWARDS AFB CA - 93524RFRCF1SROS submitted a web response on Apr 29, 2022 7:13:02 PM. A PDF copy of the web response is attached.

**Facility Response – IC-4**

Subject: Facility Response Form

Apr 29, 2022 7:13:02 PM

From: Thomas J. Warner

(661) 277-1859

thomas.warner.6@us.af.mil

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

EMAN-RNO RY 2020

- It appears your facility has sent approximately 5 shipments (sub eManifest IDs) totaling 160,075 pounds of hazardous waste listed containing Benzene to offsite location(s) for reporting year 2020, but your facility does not appear to have reported for Benzene for reporting year 2020. Could you please review your calculations and submit a new report for Benzene for reporting year 2020, if needed.

The source of these releases and quantities are listed below:

| Reported Chemical   | Response  | Reporting Year<br>(if applicable) |
|---------------------|---|-----------------------------------|
| Benzene             | No Change   |                                   |
| Reason for Response | In accordance with §372.30(a), EPA Form 9350-1 (Form R) submission is only required when an applicable threshold is exceeded. Edwards AFB conducted a comprehensive review of our 2020 reporting year TRI calculations and determined that benzene did not exceed the regulatory thresholds for reporting. We had 0 lbs. of manufacture, 0 lbs. of processed and 2,516.14 lbs. of otherwise used which is well under the applicable thresholds of 25,000, 25,000, and 10,000 lbs., respectively. Edwards AFB applied all applicable exemptions listed in §372.38 when calculating the amounts for manufactured, processed and otherwise used. |                                   |

PFAS-NOT-F RY 2020

The source of these releases and quantities are listed below:

| Response            | Reporting Year<br>(if applicable)  |
|---------------------|--|
| No Change           |  |
| Reason for Response | In accordance with §372.30(a), EPA Form 9350-1 (Form R) submission is only required when an applicable threshold is exceeded. Edwards AFB conducted a comprehensive review of our 2020 reporting year TRI calculations and determined that none of the 172 PFAS exceeded the regulatory thresholds for reporting. We had 0 lbs. of manufacture, 0 lbs. of processed and 0 lbs. of otherwise used which is well under the applicable thresholds of 100, 100, and 100 lbs., respectively. Edwards AFB applied all applicable exemptions listed in §372.38 when calculating the amounts for manufactured, processed and otherwise used. In the entire Air Force, there are only five (5) chemical products containing PFAS and none are currently authorized to use on Edwards AFB. In addition, EPA was not able to identify PFAS shipments and have marked the PFAS question as "resolved". |

.....

U.S. DOD NAWS CHINA LAKE (93555SNVYN1ADMI)  
429 E BOWEN AVE MAIL STOP 4014 CODE NAVFAC  
GRDK39/GRE2E00, CHINA LAKE, CA 93555 (Region 9)

**EPA Contractor Email – OG-1**

Contractor Email

03/29/2022 09:49am

From: *Abigail Burton*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(U.S. DOD NAWS CHINA LAKE) (TRIFID: 93555SNVYN1ADMI)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To              | E-Mail Address                   |
|----------------------|----------------------------------|
| Self: Abigail Burton | abby.burton@erg.com              |
| To: HANNAH MOORE     | HANNAH.E.MOORE24.CIV@US.NAVY.MIL |
| To: DEAN HILL        | DEAN.HILL@NAVY.MIL               |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(U.S. DOD NAWS CHINA LAKE) (TRIFID: 93555SNVYN1ADMI)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 29 13:48:51 UTC 2022

Dear DEAN HILL and HANNAH MOORE:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: U.S. DOD NAWS CHINA LAKE - (TRIFID: 93555SNVYN1ADMI) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS)

([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 2 hazardous waste shipments (some e-Manifest #: 2) totaling 26,794 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=ecea11e5-d6de-492f-94a7-55275028d888&target=0f2bc126-c7fb-49ff-987d-20a508b9f882>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

.....

**Facility Response – IC-1**

**From:** Graulau, Christina CIV USN NAVFAC SW SAN CA (USA) <christina.graulau.civ@us.navy.mil>  
**Sent:** Friday, April 22, 2022 4:30 PM  
**To:** Abby Burton <Abby.Burton@erg.com>  
**Subject:** Test Message for TRI RY2020 Summary Reports - NASNI, NBSD, SUBASE, China Lake, El Centro

Abby – Per our conversation, once you respond to this email I can send you the TRI Summary reports for these installations.

.....

R/Christina Graulau, MPH, REHS, QEP, DAAS

Supervising Physical Scientist, Environmental Compliance Core

NAVFACSW Environmental Department, N45

750 Pacific Highway, OF-1122

San Diego, CA 92132

(619) 572-3913 (mobile)

New Phone Effective 30 Oct 2020: (619) 705-5219

**New Email Effective 1 Nov 2021:** [christina.graulau.civ@us.navy.mil](mailto:christina.graulau.civ@us.navy.mil)

## EPA Contractor Email – OG-2

**From:** Abby Burton  
**Sent:** Friday, April 22, 2022 4:38 PM  
**To:** Graulau, Christina CIV USN NAVFAC SW SAN CA (USA) <christina.graulau.civ@us.navy.mil>  
**Subject:** RE: TRI RY2020 Summary Reports - NASNI, NBSD, SUBASE, China Lake, El Centro, NBVC Pt.Mugu

Thanks very much. I will review on Monday.

Abby Burton | **ERG** | 908.251.7161 (mobile) | she/her/hers

**From:** Graulau, Christina CIV USN NAVFAC SW SAN CA (USA) <[christina.graulau.civ@us.navy.mil](mailto:christina.graulau.civ@us.navy.mil)>  
**Sent:** Friday, April 22, 2022 4:35 PM  
**To:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>  
**Subject:** [WARNING: UNSCANNABLE EXTRACTION FAILED]TRI RY2020 Summary Reports - NASNI, NBSD, SUBASE, China Lake, El Centro, NBVC Pt.Mugu

Abby – Per our conversation, [enclosed are](#) the TRI Summary reports for these installations.

R/Christina Graulau, MPH, REHS, QEP, DAAS

Supervising Physical Scientist, Environmental Compliance Core

NAVFACSW Environmental Department, N45

750 Pacific Highway, OF-1122

San Diego, CA 92132

(619) 572-3913 (mobile)

New Phone Effective 30 Oct 2020: (619) 705-5219

## Facility Response – IC-2

**From:** Graulau, Christina CIV USN NAVFAC SW SAN CA (USA) <christina.graulau.civ@us.navy.mil>

**Sent:** Friday, April 22, 2022 4:35 PM

**To:** Abby Burton <Abby.Burton@erg.com>

**Subject:** [WARNING: UNSCANNABLE EXTRACTION FAILED]TRI RY2020 Summary Reports - NASNI, NBSD, SUBASE, China Lake, El Centro, NBVC Pt.Mugu

Abby – Per our conversation, [enclosed are](#) the TRI Summary reports for these installations.

R/Christina Graulau, MPH, REHS, QEP, DAAS

Supervising Physical Scientist, Environmental Compliance Core

NAVFACSW Environmental Department, N45

750 Pacific Highway, OF-1122

San Diego, CA 92132

(619) 572-3913 (mobile)

New Phone Effective 30 Oct 2020: (619) 705-5219

**New Email Effective 1 Nov 2021:** [christina.graulau.civ@us.navy.mil](mailto:christina.graulau.civ@us.navy.mil)

**U.S. ARMY GARRISON FORT HUNTER LIGGETT  
RANGES (93928SNVYFAFRCF)  
BLDG 233 CALIFORNIA AVE ATT: IMHL-PWE, FORT HUNTER  
LIGGETT, CA 93928 (Region 9)**

**EPA Contractor Email – OG-1**

Contractor Email

03/29/2022 09:52am

From: *Abigail Burton*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(US ARMY GARRISON FORT HUNTER LIGGETT RANGES) (TRIFID: 93928SNVYFAFRCF)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To              | E-Mail Address                 |
|----------------------|--------------------------------|
| Self: Abigail Burton | abby.burton@erg.com            |
| To: AMY PHILLIPS     | AMY.PHILLIPS.CIV@MAIL.MIL      |
| To: MICHAEL MOELLER  | MICHAEL.B.MOELLER.CIV@MAIL.MIL |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(US ARMY GARRISON FORT HUNTER LIGGETT RANGES) (TRIFID: 93928SNVYFAFRCF)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 29 13:52:18 UTC 2022

Dear AMY PHILLIPS and MICHAEL MOELLER:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: *US ARMY GARRISON FORT HUNTER LIGGETT RANGES - (TRIFID: 93928SNVYFAFRCF)* for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 2 hazardous waste shipments (some e-Manifest #: 2) totaling 53,991 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=a408d260-d678-46a9-94ce-e89f8bc93d92&target=f6c742a9-14b1-4fc3-9386-cafbb447c449>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

## EPA Contractor Email – OG-2

**From:** Abby Burton

**Sent:** Thursday, April 14, 2022 3:17 PM

**To:** MICHAEL.B.MOELLER.CIV@MAIL.MIL; AMY.PHILLIPS.CIV@MAIL.MIL

**Subject:** Reminder: Response Requested: TRI Data Quality Questions due April 29

Hello,

This is a reminder that EPA is requesting your response to the following Toxics Release Inventory data quality question. Even if you believe the data in question is correct and no changes are required, please fill out the survey linked below so this issue can be considered resolved.

Thank you for your cooperation.

Sincerely,

Abby Burton

**ERG (EPA Contractor) on behalf of** EPA Region 9

**From:** abby.burton@erg.com <abby.burton@erg.com>

**Sent:** Tuesday, March 29, 2022 9:56 AM

**To:** MICHAEL.B.MOELLER.CIV@MAIL.MIL; Abby Burton <Abby.Burton@erg.com>; AMY.PHILLIPS.CIV@MAIL.MIL

**Subject:** Toxics Release Inventory (TRI) Data Quality Questions [(US ARMY GARRISON FORT HUNTER LIGGETT RANGES) (TRIFID: 93928SNVYFAFRCF)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

**Toxics Release Inventory (TRI) Data Quality Questions [(US ARMY GARRISON FORT HUNTER LIGGETT RANGES) (TRIFID: 93928SNVYFAFRCF)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 29 13:52:18 UTC 2022

Dear AMY PHILLIPS and MICHAEL MOELLER:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: US ARMY GARRISON FORT HUNTER LIGGETT RANGES - (TRIFID: 93928SNVYFAFRCF) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 2 hazardous waste shipments (some e-Manifest #: 2) totaling 53,991 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=a408d260-d678-46a9-94ce-e89f8bc93d92&target=f6c742a9-14b1-4fc3-9386-cafb447c449>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

**EPA Contractor Email – OG-3**

From: Abby Burton  
Sent: Friday, April 29, 2022 12:56 PM  
To: Moeller, Michael B (Mike) CIV USARMY USAG (USA) <[michael.b.moeller.civ@army.mil](mailto:michael.b.moeller.civ@army.mil)>; Phillips, Amy CIV USARMY USAG (USA) <[amy.phillips.civ@army.mil](mailto:amy.phillips.civ@army.mil)>  
Subject: RE: Reminder: Response Requested: TRI Data Quality Questions due April 29 (UNCLASSIFIED)

Thanks, new submission is in review and you should get an "issue resolved" email soon.

Abby Burton | ERG | 908.251.7161 (mobile) | she/her/hers

-----Original Message-----

From: Moeller, Michael B (Mike) CIV USARMY USAG (USA) <[michael.b.moeller.civ@army.mil](mailto:michael.b.moeller.civ@army.mil)>  
Sent: Friday, April 29, 2022 12:44 PM  
To: Phillips, Amy CIV USARMY USAG (USA) <[amy.phillips.civ@army.mil](mailto:amy.phillips.civ@army.mil)>; Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>  
Subject: RE: Reminder: Response Requested: TRI Data Quality Questions due April 29 (UNCLASSIFIED)

CAUTION: Don't open links or attachments unless you recognize the sender and know they are safe.

CLASSIFICATION: UNCLASSIFIED

Issue has been resolved with the addition of a PFOS Form R and questionnaire (attached) completed/certified per direction via the TRIMEweb site on 4/28/2022.

Michael B. Moeller  
Compliance Branch Mgr.  
DPW, Env. Division  
USAG Fort Hunter Liggett  
Jolon, CA  
Office: (831) 386-2219  
DSN: 686-2219

Cell: 805-610-1304

I have transitioned to [Michael.b.moeller.civ@army.mil](mailto:Michael.b.moeller.civ@army.mil)

Coyote Strong!  
We are the Army's Home

-----Original Message-----

From: Phillips, Amy CIV USARMY USAG (USA) <[amy.phillips.civ@army.mil](mailto:amy.phillips.civ@army.mil)>  
Sent: Friday, April 29, 2022 9:20 AM  
To: Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>; [MICHAEL.B.MOELLER.CIV@MAIL.MIL](mailto:MICHAEL.B.MOELLER.CIV@MAIL.MIL)  
Subject: RE: Reminder: Response Requested: TRI Data Quality Questions due April 29 (UNCLASSIFIED)

CLASSIFICATION: UNCLASSIFIED

Tracking, will provide soon. Please note all our emails has changed from "mail.mil" to "army.mil".

V/R,

Amy Phillips  
FHL PAO

-----Original Message-----

From: Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>

Sent: Thursday, April 14, 2022 12:17 PM

To: [MICHAEL.B.MOELLER.CIV@MAIL.MIL](mailto:MICHAEL.B.MOELLER.CIV@MAIL.MIL); [amy.phillips.civ@mail.mil](mailto:amy.phillips.civ@mail.mil)

Subject: [Non-DoD Source] Reminder: Response Requested: TRI Data Quality Questions due April 29

Hello,

This is a reminder that EPA is requesting your response to the following Toxics Release Inventory data quality question. Even if you believe the data in question is correct and no changes are required, please fill out the survey linked below so this issue can be considered resolved.

Thank you for your cooperation.

Sincerely,

Abby Burton

ERG (EPA Contractor) on behalf of EPA Region 9

From: [abby.burton@erg.com](mailto:abby.burton@erg.com) <[abby.burton@erg.com](mailto:abby.burton@erg.com)>

Sent: Tuesday, March 29, 2022 9:56 AM

To: [MICHAEL.B.MOELLER.CIV@MAIL.MIL](mailto:MICHAEL.B.MOELLER.CIV@MAIL.MIL); Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>; [AMY.PHILLIPS.CIV@MAIL.MIL](mailto:AMY.PHILLIPS.CIV@MAIL.MIL)

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(US ARMY GARRISON FORT HUNTER LIGGETT RANGES) (TRIFID: 93928SNVYFAFRCF)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Toxics Release Inventory (TRI) Data Quality Questions [(US ARMY GARRISON FORT HUNTER LIGGETT RANGES) (TRIFID: 93928SNVYFAFRCF)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

Tue Mar 29 13:52:18 UTC 2022

Dear AMY PHILLIPS and MICHAEL MOELLER:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

The Form R for NO\_VALUE submitted to EPA from your facility: US ARMY GARRISON FORT HUNTER LIGGETT RANGES - (TRIFID: 93928SNVYFAFRCF) for reporting year(s) 2020 has been identified for follow-up due to the following:

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS)

([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 2 hazardous waste shipments (some e-Manifest #s: 2) totaling 53,991 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=a408d260-d678-46a9-94ce-e89f8bc93d92&target=f6c742a9-14b1-4fc3-9386-cafb447c449>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022.**

Please do not reply directly to this email. This email account is NOT MONITORED. Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com) <<mailto:abby.burton@erg.com>> .

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

**EPA Contractor Email – OG-4**

From: Abby Burton

Sent: Thursday, May 5, 2022 11:32 AM

To: 'Moeller, Michael B (Mike) CIV USARMY USAG (USA)' <michael.b.moeller.civ@army.mil>; Pacheco Mendez,

Monica CTR USARMY 106 SIG BDE (USA) <monica.pachecomendez.ctr@army.mil>; Phillips, Amy CIV USARMY USAG (USA) <amy.phillips.civ@army.mil>  
Subject: RE: Reminder: Response Requested: TRI Data Quality Questions due April 29 (UNCLASSIFIED)

Please dial 888-231-2017 and enter the code 485169 followed by the pound sign when prompted.

Abby Burton | ERG | 908.251.7161 (mobile) | she/her/hers

## Facility Response – IC-1

-----Original Message-----

From: Moeller, Michael B (Mike) CIV USARMY USAG (USA) <[michael.b.moeller.civ@army.mil](mailto:michael.b.moeller.civ@army.mil)>  
Sent: Thursday, May 5, 2022 10:52 AM  
To: Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>; Pacheco Mendez, Monica CTR USARMY 106 SIG BDE (USA) <[monica.pachecomendez.ctr@army.mil](mailto:monica.pachecomendez.ctr@army.mil)>; Phillips, Amy CIV USARMY USAG (USA) <[amy.phillips.civ@army.mil](mailto:amy.phillips.civ@army.mil)>  
Subject: RE: Reminder: Response Requested: TRI Data Quality Questions due April 29 (UNCLASSIFIED)

CAUTION: Don't open links or attachments unless you recognize the sender and know they are safe.

CLASSIFICATION: UNCLASSIFIED

Yes. Please set up a conference call.

Thank you,

Michael B. Moeller  
Compliance Branch Mgr.  
DPW, Env. Division  
USAG Fort Hunter Liggett  
Jolon, CA  
Office: (831) 386-2219  
DSN: 686-2219

Cell: 805-610-1304

I have transitioned to [Michael.b.moeller.civ@army.mil](mailto:Michael.b.moeller.civ@army.mil)

Coyote Strong!  
We are the Army's Home

-----Original Message-----

From: Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>  
Sent: Thursday, May 5, 2022 6:27 AM  
To: Pacheco Mendez, Monica CTR USARMY 106 SIG BDE (USA) <[monica.pachecomendez.ctr@army.mil](mailto:monica.pachecomendez.ctr@army.mil)>; Moeller, Michael B (Mike) CIV USARMY USAG (USA) <[michael.b.moeller.civ@army.mil](mailto:michael.b.moeller.civ@army.mil)>; Phillips, Amy CIV USARMY USAG (USA) <[amy.phillips.civ@army.mil](mailto:amy.phillips.civ@army.mil)>  
Subject: [Non-DoD Source] RE: Reminder: Response Requested: TRI Data Quality Questions due April 29 (UNCLASSIFIED)

Confirmed. Will you both be on the call? Should I set up a conference call number?

Abby Burton | ERG | 908.251.7161 (mobile) | she/her/hers

-----Original Message-----

From: Pacheco Mendez, Monica CTR USARMY 106 SIG BDE (USA) <[monica.pachecomendez.ctr@army.mil](mailto:monica.pachecomendez.ctr@army.mil)>  
Sent: Wednesday, May 4, 2022 3:33 PM  
To: Moeller, Michael B (Mike) CIV USARMY USAG (USA) <[michael.b.moeller.civ@army.mil](mailto:michael.b.moeller.civ@army.mil)>; Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>; Phillips, Amy CIV USARMY USAG (USA) <[amy.phillips.civ@army.mil](mailto:amy.phillips.civ@army.mil)>  
Subject: RE: Reminder: Response Requested: TRI Data Quality Questions due April 29 (UNCLASSIFIED)

CAUTION: Don't open links or attachments unless you recognize the sender and know they are safe.

Hello Ms. Burton,

Thank you for taking my call today. As discussed, I/we are available tomorrow, Thursday, 5 May at 10:00 am PT (1:00 pm ET) to discuss the EPAs questions regarding the new form submittal.

Thank you,

Monica Pacheco Mendez  
Contracted Support for  
U.S. Army Garrison Fort Hunter Liggett  
Public Works Environmental  
233 California Ave.  
Fort Hunter Liggett, 93928

D: (831) 386-2567

[monica.pachecomenedez.ctr@army.mil](mailto:monica.pachecomenedez.ctr@army.mil)  
[Monica.pachecomendez@hdrinc.com](mailto:Monica.pachecomendez@hdrinc.com)

-----Original Message-----

From: Moeller, Michael B (Mike) CIV USARMY USAG (USA) <[michael.b.moeller.civ@army.mil](mailto:michael.b.moeller.civ@army.mil)>  
Sent: Wednesday, May 4, 2022 11:38 AM  
To: Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>; Phillips, Amy CIV USARMY USAG (USA) <[amy.phillips.civ@army.mil](mailto:amy.phillips.civ@army.mil)>  
Cc: Pacheco Mendez, Monica CTR USARMY 106 SIG BDE (USA) <[monica.pachecomendez.ctr@army.mil](mailto:monica.pachecomendez.ctr@army.mil)>  
Subject: RE: Reminder: Response Requested: TRI Data Quality Questions due April 29 (UNCLASSIFIED)

CLASSIFICATION: UNCLASSIFIED

Monica,

Since you are most familiar with the reporting process, can you set up a time to call Ms. Burton?

I can be available and can initiate a 3 way call from my phone if I am needed.

Michael B. Moeller  
Compliance Branch Mgr.  
DPW, Env. Division  
USAG Fort Hunter Liggett  
Jolon, CA  
Office: (831) 386-2219  
DSN: 686-2219

Cell: 805-610-1304

I have transitioned to [Michael.b.moeller.civ@army.mil](mailto:Michael.b.moeller.civ@army.mil)

Coyote Strong!  
We are the Army's Home

-----Original Message-----

From: Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>

Sent: Wednesday, May 4, 2022 11:24 AM

To: Moeller, Michael B (Mike) CIV USARMY USAG (USA) <[michael.b.moeller.civ@army.mil](mailto:michael.b.moeller.civ@army.mil)>; Phillips, Amy CIV USARMY USAG (USA) <[amy.phillips.civ@army.mil](mailto:amy.phillips.civ@army.mil)>

Subject: [Non-DoD Source] RE: Reminder: Response Requested: TRI Data Quality Questions due April 29 (UNCLASSIFIED)

Hi Michael,

EPA has a few questions after review of the new form. I think it will be easier to discuss by phone than to try to explain by email. Can we set up a time to talk this week? Or feel free to call my cell at (908) 251-7161. I'm on the East Coast so I'm in the office until about 2:00 PT most days.

Abby Burton | ERG | 908.251.7161 (mobile) | she/her/hers

-----Original Message-----

From: Moeller, Michael B (Mike) CIV USARMY USAG (USA) <[michael.b.moeller.civ@army.mil](mailto:michael.b.moeller.civ@army.mil)>

Sent: Friday, April 29, 2022 12:44 PM

To: Phillips, Amy CIV USARMY USAG (USA) <[amy.phillips.civ@army.mil](mailto:amy.phillips.civ@army.mil)>; Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>

Subject: RE: Reminder: Response Requested: TRI Data Quality Questions due April 29 (UNCLASSIFIED)

Issue has been resolved with the addition of a PFOS Form R and questionnaire (attached) completed/certified per direction via the TRIMEweb site on 4/28/2022.

Michael B. Moeller  
Compliance Branch Mgr.  
DPW, Env. Division  
USAG Fort Hunter Liggett  
Jolon, CA  
Office: (831) 386-2219  
DSN: 686-2219

Cell: 805-610-1304

I have transitioned to [Michael.b.moeller.civ@army.mil](mailto:Michael.b.moeller.civ@army.mil)

Coyote Strong!  
We are the Army's Home

-----Original Message-----

From: Phillips, Amy CIV USARMY USAG (USA) <[amy.phillips.civ@army.mil](mailto:amy.phillips.civ@army.mil)>

Sent: Friday, April 29, 2022 9:20 AM

To: Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>; [MICHAEL.B.MOELLER.CIV@MAIL.MIL](mailto:MICHAEL.B.MOELLER.CIV@MAIL.MIL)  
Subject: RE: Reminder: Response Requested: TRI Data Quality Questions due April 29 (UNCLASSIFIED)

CLASSIFICATION: UNCLASSIFIED

Tracking, will provide soon. Please note all our emails has changed from "mail.mil" to "army.mil".

V/R,

Amy Phillips  
FHL PAO

-----Original Message-----

From: Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>  
Sent: Thursday, April 14, 2022 12:17 PM  
To: [MICHAEL.B.MOELLER.CIV@MAIL.MIL](mailto:MICHAEL.B.MOELLER.CIV@MAIL.MIL); [amy.phillips.civ@mail.mil](mailto:amy.phillips.civ@mail.mil)  
Subject: [Non-DoD Source] Reminder: Response Requested: TRI Data Quality Questions due April 29

Hello,

This is a reminder that EPA is requesting your response to the following Toxics Release Inventory data quality question. Even if you believe the data in question is correct and no changes are required, please fill out the survey linked below so this issue can be considered resolved.

Thank you for your cooperation.

Sincerely,

Abby Burton

ERG (EPA Contractor) on behalf of EPA Region 9

From: [abby.burton@erg.com](mailto:abby.burton@erg.com) <[abby.burton@erg.com](mailto:abby.burton@erg.com)>  
Sent: Tuesday, March 29, 2022 9:56 AM  
To: [MICHAEL.B.MOELLER.CIV@MAIL.MIL](mailto:MICHAEL.B.MOELLER.CIV@MAIL.MIL); Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>; [AMY.PHILLIPS.CIV@MAIL.MIL](mailto:AMY.PHILLIPS.CIV@MAIL.MIL)  
Subject: Toxics Release Inventory (TRI) Data Quality Questions [(US ARMY GARRISON FORT HUNTER LIGGETT RANGES) (TRIFID: 93928SNVYFAFRCF)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Toxics Release Inventory (TRI) Data Quality Questions [(US ARMY GARRISON FORT HUNTER LIGGETT RANGES) (TRIFID: 93928SNVYFAFRCF)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

Tue Mar 29 13:52:18 UTC 2022

Dear AMY PHILLIPS and MICHAEL MOELLER:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

The Form R for NO\_VALUE submitted to EPA from your facility: US ARMY GARRISON FORT HUNTER LIGGETT RANGES - (TRIFID: 93928SNVYFAFRCF) for reporting year(s) 2020 has been identified for follow-up due to the following:

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 2 hazardous waste shipments (some e-Manifest #s: 2) totaling 53,991 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=a408d260-d678-46a9-94ce-e89f8bc93d92&target=f6c742a9-14b1-4fc3-9386-cafb447c449>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022.**

Please do not reply directly to this email. This email account is NOT MONITORED. Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com) <<mailto:abby.burton@erg.com>> .

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

### Facility Response – IC-2

From: Moeller, Michael B (Mike) CIV USARMY USAG (USA) <[michael.b.moeller.civ@army.mil](mailto:michael.b.moeller.civ@army.mil)>  
Sent: Friday, April 29, 2022 12:44 PM  
To: Phillips, Amy CIV USARMY USAG (USA) <[amy.phillips.civ@army.mil](mailto:amy.phillips.civ@army.mil)>; Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>  
Subject: RE: Reminder: Response Requested: TRI Data Quality Questions due April 29 (UNCLASSIFIED)

CAUTION: Don't open links or attachments unless you recognize the sender and know they are safe.

CLASSIFICATION: UNCLASSIFIED

Issue has been resolved with the addition of a PFOS Form R and questionnaire (attached) completed/certified per direction via the TRIMEweb site on 4/28/2022.

Michael B. Moeller  
Compliance Branch Mgr.  
DPW, Env. Division  
USAG Fort Hunter Liggett  
Jolon, CA  
Office: (831) 386-2219  
DSN: 686-2219

Cell: 805-610-1304

I have transitioned to [Michael.b.moeller.civ@army.mil](mailto:Michael.b.moeller.civ@army.mil)

Coyote Strong!  
We are the Army's Home

-----Original Message-----

From: Phillips, Amy CIV USARMY USAG (USA) <[amy.phillips.civ@army.mil](mailto:amy.phillips.civ@army.mil)>  
Sent: Friday, April 29, 2022 9:20 AM  
To: Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>; [MICHAEL.B.MOELLER.CIV@MAIL.MIL](mailto:MICHAEL.B.MOELLER.CIV@MAIL.MIL)  
Subject: RE: Reminder: Response Requested: TRI Data Quality Questions due April 29 (UNCLASSIFIED)

CLASSIFICATION: UNCLASSIFIED

Tracking, will provide soon. Please note all our emails has changed from "mail.mil" to "army.mil".

V/R,

Amy Phillips  
FHL PAO

-----Original Message-----

From: Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>

Sent: Thursday, April 14, 2022 12:17 PM

To: [MICHAEL.B.MOELLER.CIV@MAIL.MIL](mailto:MICHAEL.B.MOELLER.CIV@MAIL.MIL); [amy.phillips.civ@mail.mil](mailto:amy.phillips.civ@mail.mil)

Subject: [Non-DoD Source] Reminder: Response Requested: TRI Data Quality Questions due April 29

Hello,

This is a reminder that EPA is requesting your response to the following Toxics Release Inventory data quality question. Even if you believe the data in question is correct and no changes are required, please fill out the survey linked below so this issue can be considered resolved.

Thank you for your cooperation.

Sincerely,

Abby Burton

ERG (EPA Contractor) on behalf of EPA Region 9

From: [abby.burton@erg.com](mailto:abby.burton@erg.com) <[abby.burton@erg.com](mailto:abby.burton@erg.com)>

Sent: Tuesday, March 29, 2022 9:56 AM

To: [MICHAEL.B.MOELLER.CIV@MAIL.MIL](mailto:MICHAEL.B.MOELLER.CIV@MAIL.MIL); Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>; [AMY.PHILLIPS.CIV@MAIL.MIL](mailto:AMY.PHILLIPS.CIV@MAIL.MIL)

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(US ARMY GARRISON FORT HUNTER LIGGETT RANGES) (TRIFID: 93928SNVYFAFRCF)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Toxics Release Inventory (TRI) Data Quality Questions [(US ARMY GARRISON FORT HUNTER LIGGETT RANGES) (TRIFID: 93928SNVYFAFRCF)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

Tue Mar 29 13:52:18 UTC 2022

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This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

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Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 2 hazardous waste shipments (some e-Manifest #: 2) totaling 53,991 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

*Step 1:*

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=a408d260-d678-46a9-94ce-e89f8bc93d92&target=f6c742a9-14b1-4fc3-9386-cafb447c449>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

*Step 2:*

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022.**

Please do not reply directly to this email. This email account is NOT MONITORED. Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com) <<mailto:abby.burton@erg.com>> .

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

### Facility Response – IC-3

**From:** no-reply@epacdx.net <no-reply@epacdx.net>

**Sent:** Friday, April 29, 2022 2:01 AM

**To:** Moeller, Michael B (Mike) CIV USARMY USAG (USA) <michael.b.moeller.civ@army.mil>

**Subject:** [Non-DoD Source] TRI eReceipt (electronic Facility Receipt) Available for Review.

Dear TRI Facility,

EPA has received your certified TRI-MEweb submission and your facility now has the opportunity to review the data before it is released to the public.

Your facility has an electronic Facility Receipt (eReceipt) awaiting your review in TRI-MEweb. The eReceipt is a TRI reporter's sole opportunity to review the data they have submitted to EPA before it is released to the public.

TRI-MEweb submitters may gain access to their eReceipt by logging into their CDX account, clicking the "TRI-MEweb" link to launch the TRI-MEweb application, and navigating to the "Notifications" section of the My TRI page. Users can also view their eReceipts from the "Submission History" page under the "Facility eReceipt" column.

If you have any questions regarding this email, please contact the CDX Help Desk at the phone numbers listed below for further assistance. Please reference the information below when contacting the CDX Help Desk.

---- REFERENCE INFORMATION ----

TRI Facility ID: 93928SNVYFAFRCF

Access Key:

| Chemical Name                 | RY   | CAS     | Form | Revision | Withdrawal |
|-------------------------------|------|---------|------|----------|------------|
| Perfluorooctane sulfonic acid | 2020 | 1763231 | R    | No       | No         |

---- SYSTEM REQUIREMENTS (for accessing your eReceipt via TRI-MEweb) ----

1. Computer with an Internet connection.
2. A Web browser, such as Internet Explorer, Firefox, or Google Chrome.
3. The Web browser must have a security setting of TLS 1.0 or 2.0 enabled. For IE 10 and below, it may be necessary to enable compatibility mode by turning it on under Compatibility View Settings. Otherwise, the CDX

login web page will appear as if it is broken.

4. Pop-ups must be allowed for [cdx.epa.gov](http://cdx.epa.gov) or all pop-up blockers must be disabled. Or, add an exception to allow pop-ups for [trimeweb.epa.gov](http://trimeweb.epa.gov) to the pop-up blocker settings.

5. Browser must be set to allow JavaScript.

6. Adobe Acrobat Reader version 5.05 or higher.

7. For detailed instructions how to adjust the settings on your Web browser, go to the TRI-MEweb Resource Web page: <http://www2.epa.gov/toxics-release-inventory-tri-program/tri-meweb-resources>

---- CDX HELP DESK ----

Phone (toll-free): +1 (888) 890-1995

Phone (toll): (970) 494-5500

Email: [helpdesk@epacdx.net](mailto:helpdesk@epacdx.net)

The CDX Help Desk is available Monday through Friday, 8:00 AM to 6:00 PM Eastern Time.

Access CDX Home: <https://cdx.epa.gov/>

## Facility Response – IC-4

Subject: Facility Response Form

Apr 28, 2022 7:26:01 PM

From: Michael Moeller

(831) 386-2219

[michael.b.moeller.civ@army.mil](mailto:michael.b.moeller.civ@army.mil)

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

PFAS-NOT-F RY 2020

The source of these releases and quantities are listed below:

| Response            | Reporting Year<br>(if applicable)  |
|---------------------|--|
| New Submission 2020 |  |
| Reason for Response | As required by TRI QuEST, Facility Response to TRI Data Quality Email. For facility 939328NVYAFRCF - US ARMY GARRISON FORT HUNTER LIGGETT RANGES |

.....

US DOD USAF TRAVIS AFB (94535SDDSR420AI)  
400 BRENNAN CIRCLE, TRAVIS AFB, CA 94535 (Region 9)

**EPA Contractor Email – OG-1**

Contractor Email

03/29/2022 09:54am

From: *Abigail Burton*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF TRAVIS AFB) (TRIFID: 94535SDDSR420AI)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To              | E-Mail Address              |
|----------------------|-----------------------------|
| Self: Abigail Burton | abby.burton@erg.com         |
| To: HEIDEMARIE COUCH | HEIDEMARE.COUCH.1@US.AF.MIL |
| To: ARVEY ANDREWS    | ARVEY.ANDREWS@US.AF.MIL     |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF TRAVIS AFB) (TRIFID: 94535SDDSR420AI)]  
Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 29 13:53:54 UTC 2022

Dear ARVEY ANDREWS and HEIDEMARIE COUCH:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: US DOD USAF TRAVIS AFB) - (TRIFID: 94535SDDSR420AI) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI),

and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 6 hazardous waste shipments (some e-Manifest #s: 6) totaling 199,842 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=74daa881-5b53-4e47-b1e4-0b800b528826&target=dfb9b267-18ba-454f-a5b8-eb8d34d3c4e6>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022.**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

**EPA Contractor Email – OG-2**

Contractor Email

04/15/2022 02:59pm

From: *Abigail Burton*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To              | E-Mail Address              |
|----------------------|-----------------------------|
| Self: Abigail Burton | abby.burton@erg.com         |
| To: HEIDEMARIE COUCH | HEIDEMARE.COUCH.1@US.AF.MIL |
| To: ARVEY ANDREWS    | ARVEY.ANDREWS@US.AF.MIL     |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Region 9

Fri Apr 15 18:59:08 UTC 2022

Dear ARVEY ANDREWS and HEIDEMARIE COUCH:

EPA would like to inform you that data quality issues raised for your facility [US DOD USAF TRAVIS AFB (TRIFID: 94535SDDSR420AI)] during reporting year 2020 Adhoc Data Quality Checks are resolved for the following:

Reporting Year(s) Chemicals

2020 No chemicals

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Abigail Burton

***ERG (EPA Contractor) on behalf of***

TRI Data Quality Program

US EPA

Region 9

**Email sent on 03/29/2022 01:54pm**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF TRAVIS AFB) (TRIFID: 94535SDDSR420AI)]  
Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 29 13:53:54 UTC 2022

Dear ARVEY ANDREWS and HEIDEMARIE COUCH:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: US DOD USAF TRAVIS AFB) - (TRIFID: 94535SDDSR420AI) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 6 hazardous waste shipments (some e-Manifest #: 6) totaling 199,842 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

*Step 1:*

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=74daa881-5b53-4e47-b1e4-0b800b528826&target=dfb9b267-18ba-454f-a5b8-eb8d34d3c4e6>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

*Step 2:*

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-

MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022.**

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If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

### **EPA Contractor Email – OG-3**

**From:** Abby Burton

**Sent:** Thursday, April 14, 2022 3:30 PM

**To:** ARVEY.ANDREWS@US.AF.MIL; HEIDEMARE.COUCH.1@US.AF.MIL

**Subject:** Reminder: Response Requested: TRI Data Quality Questions due April 29

Hello,

This is a reminder that EPA is requesting your response to the following Toxics Release Inventory data quality question. Even if you believe the data in question is correct and no changes are required, please fill out the survey linked below so this issue can be considered resolved.

Thank you for your cooperation.

Sincerely,

Abby Burton

**ERG (EPA Contractor) on behalf of** EPA Region 9

**From:** [abby.burton@erg.com](mailto:abby.burton@erg.com) <[abby.burton@erg.com](mailto:abby.burton@erg.com)>

**Sent:** Tuesday, March 29, 2022 10:00 AM

**To:** ARVEY.ANDREWS@US.AF.MIL; Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>; HEIDEMARE.COUCH.1@US.AF.MIL

**Subject:** Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF TRAVIS AFB) (TRIFID: 94535SDDSR420AI)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

#### **UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF TRAVIS AFB) (TRIFID: 94535SDDSR420AI)]  
Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 29 13:53:54 UTC 2022

Dear ARVEY ANDREWS and HEIDEMARIE COUCH:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: US DOD USAF TRAVIS AFB) - (TRIFID: 94535SDDSR420AI) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 6 hazardous waste shipments (some e-Manifest #s: 6) totaling 199,842 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

*Step 1:*

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=74daa881-5b53-4e47-b1e4-0b800b528826&target=dfb9b267-18ba-454f-a5b8-eb8d34d3c4e6>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

*Step 2:*

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If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022.**

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Thank you for your attention to this matter.

Sincerely,

Abigail Burton

### Facility Response – IC-1

Subject: Facility Response Form

Apr 15, 2022 4:13:51 PM

From: Arvey Andrews

(707) 424-7514

arvey.andrews@us.af.mil

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

PFAS-NOT-F RY 2020

The source of these releases and quantities are listed below:

| Response            |   | Reporting Year<br>(if applicable) |
|---------------------|---|-----------------------------------|
| No Change           |   |                                   |
| Reason for Response | The waste shipments described in the 6 manifests contained Chemguard C2 and residual Ansulite 3% AFFF. Chemguard C2 and Ansulite 3% AFFF do not contain Section 7321 chemicals. |                                   |

.....

**DOW AGROSCIENCES LLC (94565DWCHMFOOTO)  
901 LOVERIDGE RD, PITTSBURG, CA 94565 (Region 9)**

**EPA Contractor Email – OG-1**

Contractor Email

03/25/2022 05:35am

From: *Abigail Burton*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(DOW AGROSCIENCES LLC) (TRIFID: 94565DWCHMFOOTO)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To               | E-Mail Address                |
|-----------------------|-------------------------------|
| Self: Abigail Burton  | abby.burton@erg.com           |
| To: CARLOS ECHEVERRIA | CARLOS.ECHEVERRIA@CORTEVA.COM |
| To: LISA BACKLUND     | LISA.BACKLUND@CORTEVA.COM     |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(DOW AGROSCIENCES LLC) (TRIFID: 94565DWCHMFOOTO)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Fri Mar 25 09:35:02 EDT 2022

Dear CARLOS ECHEVERRIA and LISA BACKLUND:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: DOW AGROSCIENCES LLC) - (TRIFID: 94565DWCHMFOOTO) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI),

and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 1 hazardous waste shipments (some e-Manifest #s: 1) totaling 9,948 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=d07b3b07-d2dc-492a-a35a-dab60c1ef71f&target=1ae29fa9-01e6-4885-a8a3-9d7767e704fc>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

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If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

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If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

**Facility Response – IC-1**

**From:** Backlund, Lisa <lisa.backlund@corteva.com>

**Sent:** Friday, April 22, 2022 1:44 PM

**To:** Abby Burton <Abby.Burton@erg.com>

**Subject:** RE: Reminder: Response Requested: TRI Data Quality Questions due April 29

Good morning Abby,

Thank you for reaching out to me yesterday. I have been reviewing the Pittsburg site data and will be responding to the questionnaire early next week. I don't have any questions for you at this time.

Lisa Backlund

Pittsburg EH&S

## **EPA Contractor Email – OG-2**

**From:** Abby Burton <Abby.Burton@erg.com>

**Sent:** Monday, April 11, 2022 1:26 PM

**To:** Backlund, Lisa <lisa.backlund@corteva.com>; Echeverria, Carlos <carlos.echeverria@corteva.com>

**Subject:** [EXTERNAL] Reminder: Response Requested: TRI Data Quality Questions due April 29

Hello,

This is a reminder that EPA is requesting your response to the following Toxics Release Inventory data quality question. Even if you believe the data in question is correct and no changes are required, please fill out the survey linked below so this issue can be considered resolved.

Thank you for your cooperation.

Sincerely,

Abby Burton

**ERG (EPA Contractor) on behalf of** EPA Region 9

**From:** [abby.burton@erg.com](mailto:abby.burton@erg.com) <[abby.burton@erg.com](mailto:abby.burton@erg.com)>

**Sent:** Friday, March 25, 2022 9:40 AM

**To:** [LISA.BACKLUND@CORTEVA.COM](mailto:LISA.BACKLUND@CORTEVA.COM); Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>;

[CARLOS.ECHEVERRIA@CORTEVA.COM](mailto:CARLOS.ECHEVERRIA@CORTEVA.COM)

**Subject:** Toxics Release Inventory (TRI) Data Quality Questions [(DOW AGROSCIENCES LLC) (TRIFID: 94565DWCHMFOOTO)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

### **UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(DOW AGROSCIENCES LLC) (TRIFID: 94565DWCHMFOOTO)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Fri Mar 25 09:35:02 EDT 2022

Dear CARLOS ECHEVERRIA and LISA BACKLUND:

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This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: *DOW AGROSCIENCES LLC* - (TRIFID: *94565DWCHMFOOTO*) for reporting year(s) 2020 has been identified for follow-up due to the following:**

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*Step 2:*

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If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

### **EPA Contractor Email – OG-3**

Contractor Email

04/26/2022 09:34am

From: *Abigail Burton*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To               | E-Mail Address                |
|-----------------------|-------------------------------|
| Self: Abigail Burton  | abby.burton@erg.com           |
| To: CARLOS ECHEVERRIA | CARLOS.ECHEVERRIA@CORTEVA.COM |
| To: LISA BACKLUND     | LISA.BACKLUND@CORTEVA.COM     |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Region 9

Tue Apr 26 13:33:48 UTC 2022

Dear CARLOS ECHEVERRIA and LISA BACKLUND:

EPA would like to inform you that data quality issues raised for your facility [DOW AGROSCIENCES LLC (TRIFID: 94565DWCHMFOOTO)] during reporting year 2020 Adhoc Data Quality Checks are resolved for the following:

#### Reporting Year(s) Chemicals

2020 No chemicals

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Abigail Burton

***ERG (EPA Contractor) on behalf of:***

TRI Data Quality Program

US EPA

Region 9

Email sent on 04/25/2022 10:30pm

DOW AGROSCIENCES LLC - 94565DWCHMFOOTO submitted a web response on Apr 25, 2022 10:29:42 PM. A PDF copy of the web response is attached.

### Facility Response – IC-2

Subject: Facility Response Form

Apr 25, 2022 10:29:42 PM

From: Lisa Backlund

(925) 432-5452 lisa.backlund@corteva.com

Contractor Company Name: Corteva agriscience

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

PFAS-NOT-F RY 2020

The source of these releases and quantities are listed below:

| Response            |   | Reporting Year<br>(if applicable) |
|---------------------|---|-----------------------------------|
| No Change           |   |                                   |
| Reason for Response | No Form R is warranted for RY2020 and it is correct that no Form R for PFAS was submitted for RY2020 from the facility. The material was not used in any way constituting otherwise use. The material from the fire truck tank was directly shipped off-site for disposal, which according to the EPA PFAS guidance document is not reportable. |                                   |

.....

U.S. DOD, USAF, BEALE AFB (95903SDDSFENDOF)  
9 CES/CEIE 6425 B ST, BEALE AFB, CA 95903 (Region 9)

**EPA Contractor Email – OG-1**

Contractor Email

03/29/2022 09:49am

From: *Abigail Burton*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(U.S. DOD, USAF, BEALE AFB) (TRIFID: 95903SDDSFENDOF)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To                             | E-Mail Address                   |
|-------------------------------------|----------------------------------|
| Self: Abigail Burton                | abby.burton@erg.com              |
| To: BEALE AFB PUBLIC AFFAIRS OFFICE | 9RW.PA@US.AF.MIL                 |
| To: MR. CHRISTOPHER GALLOWAY        | CHRISTOPHER.GALLOWAY.5@US.AF.MIL |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(U.S. DOD, USAF, BEALE AFB) (TRIFID: 95903SDDSFENDOF)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 29 13:49:27 UTC 2022

Dear MR. CHRISTOPHER GALLOWAY and BEALE AFB PUBLIC AFFAIRS OFFICE:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: U.S. DOD, USAF, BEALE AFB - (TRIFID: 95903SDDSFENDOF) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-)

cbi\_pfas\_list\_1\_8\_2021\_final.pdf) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 1 hazardous waste shipments (some e-Manifest #s: 1) totaling 29,152 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=df4c9fff-8f96-4f98-90a4-81d3407317b0&target=c59e83b5-87d4-4429-ae37-d8a591d76b7e>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

**EPA Contractor Email – OG-2**

Contractor Email

04/29/2022 04:05pm

From: *Abigail Burton*

Subject: TRI Data Quality Issues Resolved [DO NOT REPLY]

| Sent To                             | E-Mail Address                   |
|-------------------------------------|----------------------------------|
| Self: Abigail Burton                | abby.burton@erg.com              |
| Cc: eric.maresh.3@us.af.mil         | eric.maresh.3@us.af.mil          |
| To: BEALE AFB PUBLIC AFFAIRS OFFICE | 9RW.PA@US.AF.MIL                 |
| To: MR. CHRISTOPHER GALLOWAY        | CHRISTOPHER.GALLOWAY.5@US.AF.MIL |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Region 9

Fri Apr 29 20:05:37 UTC 2022

Dear MR. CHRISTOPHER GALLOWAY and BEALE AFB PUBLIC AFFAIRS OFFICE:

EPA would like to inform you that data quality issues raised for your facility [U.S. DOD, USAF, BEALE AFB (TRIFID: 95903SDDSFENDOF)] during reporting year 2020 Adhoc Data Quality Checks are resolved for the following:

Reporting Year(s) Chemicals

2020 No chemicals

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Abigail Burton

***ERG (EPA Contractor) on behalf of***

TRI Data Quality Program

US EPA

Region 9

**Email sent on 03/29/2022 01:49pm**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(U.S. DOD, USAF, BEALE AFB) (TRIFID: 95903SDDSFENDOF)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Tue Mar 29 13:49:27 UTC 2022

Dear MR. CHRISTOPHER GALLOWAY and BEALE AFB PUBLIC AFFAIRS OFFICE:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: U.S. DOD, USAF, BEALE AFB - (TRIFID: 95903SDDSFENDOF) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 1 hazardous waste shipments (some e-Manifest #: 1) totaling 29,152 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

*Step 1:*

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=df4c9fff-8f96-4f98-90a4-81d3407317b0&target=c59e83b5-87d4-4429-ae37-d8a591d76b7e>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

*Step 2:*

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MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

### **EPA Contractor Email – OG-3**

**From:** Abby Burton

**Sent:** Thursday, April 14, 2022 3:03 PM

**To:** 9RW.PA@US.AF.MIL; CHRISTOPHER.GALLOWAY.5@US.AF.MIL

**Subject:** Reminder: Response Requested: TRI Data Quality Questions due April 29

Hello,

This is a reminder that EPA is requesting your response to the following Toxics Release Inventory data quality question. Even if you believe the data in question is correct and no changes are required, please fill out the survey linked below so this issue can be considered resolved.

Thank you for your cooperation.

Sincerely,

Abby Burton

**ERG (EPA Contractor) on behalf of** EPA Region 9

**From:** [abby.burton@erg.com](mailto:abby.burton@erg.com) <[abby.burton@erg.com](mailto:abby.burton@erg.com)>

**Sent:** Tuesday, March 29, 2022 9:50 AM

**To:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>; 9RW.PA@US.AF.MIL; CHRISTOPHER.GALLOWAY.5@US.AF.MIL

**Subject:** Toxics Release Inventory (TRI) Data Quality Questions [(U.S. DOD, USAF, BEALE AFB) (TRIFID: 95903SDDSFENDOF)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Toxics Release Inventory (TRI) Data Quality Questions [(U.S. DOD, USAF, BEALE AFB) (TRIFID: 95903SDDSFENDOF)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

Tue Mar 29 13:49:27 UTC 2022

Dear MR. CHRISTOPHER GALLOWAY and BEALE AFB PUBLIC AFFAIRS OFFICE:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: U.S. DOD, USAF, BEALE AFB - (TRIFID: 95903SDDSFENDOF) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 1 hazardous waste shipments (some e-Manifest #s: 1) totaling 29,152 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=df4c9fff-8f96-4f98-90a4-81d3407317b0&target=c59e83b5-87d4-4429-ae37-d8a591d76b7e>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve

access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb).  
<https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

#### **EPA Contractor Email – OG-4**

**From:** Abby Burton

**Sent:** Monday, April 25, 2022 4:04 PM

**To:** BRENNIS, THEODORE M GS-09 USAF ACC 9 CES/CEIE <[theodore.brennis.1@us.af.mil](mailto:theodore.brennis.1@us.af.mil)>

**Cc:** MARESH, ERIC G CIV USAF ACC 9 CES/CEIE <[eric.maresh.3@us.af.mil](mailto:eric.maresh.3@us.af.mil)>

**Subject:** RE: EPA Question Regarding Toxic Inventory Release

Thank you for the additional information. The question is a little more broad and includes any other use of TRI-reportable PFAS or PFAS-containing AFFF that could have triggered a requirement to report to TRI. That would include intentional use of fire suppression equipment that used PFAS-containing AFFF.

Abby Burton | **ERG** | 908.251.7161 (mobile) | she/her/hers

#### **Facility Response – IC-1**

**From:** BRENNIS, THEODORE M GS-09 USAF ACC 9 CES/CEIE <[theodore.brennis.1@us.af.mil](mailto:theodore.brennis.1@us.af.mil)>

**Sent:** Friday, April 22, 2022 4:52 PM

**To:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>

**Cc:** MARESH, ERIC G CIV USAF ACC 9 CES/CEIE <[eric.maresh.3@us.af.mil](mailto:eric.maresh.3@us.af.mil)>

**Subject:** EPA Question Regarding Toxic Inventory Release

Hi Ms. Burton,

Nice talking with you on the phone a few moments ago.

I've cc'ed Mr. Eric Maresh, our Hazardous Waste Program Manager. He'll probably be able to fill in any gaps that I'm not able to. Here's his contact info

ERIC MARESH

9 CES/CEIE

6425 B St.

Beale AFB, CA 95903

Desk 530-634-2644 DSN 368

Cell 530-615-8560

To restate your question for Mr. Maresh, you asked if there were any PFAS / AFFF spills that should have been reported on our 2020 Toxics Release Inventory. Please let me know if I got that wrong.

To answer your question, we keep a record of all reportable spills in our Integrated Contingency Plan. I just scanned through Annex B (Reportable Spill History) for 2020, and there were no PFAS/AFFF releases during that period.

Does that answer your question? Let me know if you want a copy of the ICP or if I can help with anything else.

v/r

-Ted

**Theodore M. Brennis**

**Fuel / POL / Tanks Program Manager**

**9<sup>th</sup> CES/CEIE**

**6425 B Street, Bldg. B25390**

**Beale AFB, CA 95903**

**Commercial: 530-634-3987**

**DSN: 368-3987**

**[theodore.brennis.1@us.af.mil](mailto:theodore.brennis.1@us.af.mil)**

## **Facility Response – IC-2**

Status Update

04/25/2022

Abigail Burton

Abigail Burton updated the Error Status from "Unresolved" to "Pending Revision" with Facility Response Code "NYR - Other reasons, including more information needed from facility" for Error Code PFAS-NOT-F and reporting year 2020. facility confirmed they had no spills of AFFF, confirming whether they had any intentional use or other PFAS use.

.....

**IES DOWNSTREAM LLC - KAPOLEI  
TERMINAL (96707CHVRN91480)  
91-480 MALAKOLE ST, KAPOLEI, HI 96707 (Region 9)**

**EPA Contractor Email – OG-1**

Contractor Email

03/25/2022 07:55am

From: *Abigail Burton*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(IES DOWNSTREAM LLC - KAPOLEI TERMINAL) (TRIFID: 96707CHVRN91480)] Form R for Reporting Year(s) 2019 and 2020 - Due April 29, 2022

| Sent To              | E-Mail Address                        |
|----------------------|---------------------------------------|
| Self: Abigail Burton | abby.burton@erg.com                   |
| To: GAIL GODENZI     | GAIL.GODENZI@ISLANDENERGYSERVICES.COM |
| To: GAIL GODENZI     | GAIL.GODENZI@ISLANDENERGYSERVICES.COM |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(IES DOWNSTREAM LLC - KAPOLEI TERMINAL) (TRIFID: 96707CHVRN91480)] Form R for Reporting Year(s) 2019 and 2020 - Due April 29, 2022**

Fri Mar 25 11:54:43 EDT 2022

Dear GAIL GODENZI:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2019 and 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Cumene submitted to EPA from your facility: *IES DOWNSTREAM LLC - KAPOLEI TERMINAL*) - (TRIFID: 96707CHVRN91480) for reporting year(s) 2019 and 2020 has been identified for follow-up due to the following:**

Reporting Year 2019

- For reporting year 2019, your facility might have reported for TRI listed chemical (CASRN: 98-82-8) as imported production volume in excess of TRI reportable threshold amounts to 2020 TSCA Chemical Data Reporting (CDR), but not reported for Cumene to TRI for reporting year 2019. Please review your calculations and submit new report for Cumene for reporting year 2019, if required.

#### Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 1 hazardous waste shipments (some e-Manifest #: 1) totaling 16,252 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

#### ***How do I respond to this inquiry? (Step 1 is always required)***

##### *Step 1:*

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=95b5acfb-595d-47d9-bee3-61ec95b84bc2&target=19da6a4f-c979-4eb5-9062-d7ce7021d194>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

##### *Step 2:*

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

## EPA Contractor Email – OG-2

**From:** Abby Burton

**Sent:** Tuesday, May 3, 2022 4:06 PM

**To:** 'Godenzi, Gail' <Gail.Godenzi@islandenergyservices.com>

**Subject:** RE: [\*EXTERNAL\*] Toxics Release Inventory (TRI) Data Quality Questions [(IES DOWNSTREAM LLC - KAPOLEI TERMINAL) (TRIFID: 96707CHVRN91480)] Form R for Reporting Year(s) 2019 and 2020 - Due April 29, 2022

Hi Gail,

Attached see the e-manifest in question. Apparently the *e-manifest ID* I was looking at is assigned in the electronic system, so it's different than the *manifest tracking number* on the paper form.

Abby Burton | [ERG](#) | 908.251.7161 (mobile) | she/her/hers

## Facility Response – IC-1

**From:** Godenzi, Gail <Gail.Godenzi@islandenergyservices.com>

**Sent:** Tuesday, May 3, 2022 3:16 PM

**To:** Abby Burton <Abby.Burton@erg.com>

**Subject:** RE: [\*EXTERNAL\*] Toxics Release Inventory (TRI) Data Quality Questions [(IES DOWNSTREAM LLC - KAPOLEI TERMINAL) (TRIFID: 96707CHVRN91480)] Form R for Reporting Year(s) 2019 and 2020 - Due April 29, 2022

We did not use any PFAS chemicals in 2020 so thanks!!

Hope you got my answer to the cumene question. The CDR report used the SDS quantity (high, but conservative), while the TRI report used the actual amount based on analytical data. This is why the quantities don't match.

## EPA Contractor Email – OG-3

**From:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>

**Sent:** Tuesday, May 3, 2022 9:11 AM

**To:** Godenzi, Gail <[Gail.Godenzi@islandenergyservices.com](mailto:Gail.Godenzi@islandenergyservices.com)>

**Subject:** RE: [\*EXTERNAL\*] Toxics Release Inventory (TRI) Data Quality Questions [(IES DOWNSTREAM LLC - KAPOLEI TERMINAL) (TRIFID: 96707CHVRN91480)] Form R for Reporting Year(s) 2019 and 2020 - Due April 29, 2022

Hi Gail,

I'm following up with EPA to try to figure out this manifest issue. I'm not a RCRA expert so I don't know what could cause any apparent mismatch.

In the meantime, if your facility didn't use any TRI-reportable PFAS chemicals in 2020, I can mark that down for the TRI data quality check.

Abby Burton | **ERG** | 908.251.7161 (mobile) | she/her/hers

**From:** Godenzi, Gail <[Gail.Godenzi@islandenergyservices.com](mailto:Gail.Godenzi@islandenergyservices.com)>

**Sent:** Tuesday, May 3, 2022 3:05 PM

**To:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>

**Subject:** RE: [\*EXTERNAL\*] Toxics Release Inventory (TRI) Data Quality Questions [(IES DOWNSTREAM LLC - KAPOLEI TERMINAL) (TRIFID: 96707CHVRN91480)] Form R for Reporting Year(s) 2019 and 2020 - Due April 29, 2022

Abby, I had our Admin people go thru every hard copy manifest on file, as well as all the electronic files for the last 5 years and we do not have a record of any Hazardous Waste Manifest 009835919. Perhaps the Generator accidentally used our RCRA ID number?? Or maybe our waste hauler??

### EPA Contractor Email – OG-4

**From:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>

**Sent:** Monday, May 2, 2022 8:23 AM

**To:** Godenzi, Gail <[Gail.Godenzi@islandenergyservices.com](mailto:Gail.Godenzi@islandenergyservices.com)>

**Subject:** RE: [\*EXTERNAL\*] Toxics Release Inventory (TRI) Data Quality Questions [(IES DOWNSTREAM LLC - KAPOLEI TERMINAL) (TRIFID: 96707CHVRN91480)] Form R for Reporting Year(s) 2019 and 2020 - Due April 29, 2022

That manifest is from RCRA ID HIT160010005 which EPA has associated with Island Energy's TRI facility ID. Can you confirm that RCRA ID is correctly associated with your facility? If so, I'll need to follow up with EPA headquarters to figure this out.

Abby Burton | **ERG (EPA Contractor)** | 908.251.7161 (mobile) | she/her/hers

### Facility Response – IC-2

**From:** Godenzi, Gail <[Gail.Godenzi@islandenergyservices.com](mailto:Gail.Godenzi@islandenergyservices.com)>

**Sent:** Monday, May 2, 2022 2:02 PM

**To:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>

**Subject:** RE: [\*EXTERNAL\*] Toxics Release Inventory (TRI) Data Quality Questions [(IES DOWNSTREAM LLC - KAPOLEI TERMINAL) (TRIFID: 96707CHVRN91480)] Form R for Reporting Year(s) 2019 and 2020 - Due April 29, 2022

Dear Abby, Can you double check this is for Island Energy Services?? I can not find a manifest with the number below. All our manifests start with the numbers 006 (not 009). Would you happen to have a copy of the manifest?? We are very confused and want to resolve this ASAP.

Gail

**Gail Godenzi**

Technical Manager

[gail.godenzi@islandenergyservices.com](mailto:gail.godenzi@islandenergyservices.com)

IES Downstream, LLC

91-480 Malakole Street

Kapolei, HI 96707

Tel +1 808 682 3113

Mobile +1 808 352 7840



### EPA Contractor Email – OG-5

**From:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>

**Sent:** Friday, April 29, 2022 3:57 AM

**To:** Godenzi, Gail <[Gail.Godenzi@islandenergyservices.com](mailto:Gail.Godenzi@islandenergyservices.com)>

**Subject:** RE: [\*EXTERNAL\*] Toxics Release Inventory (TRI) Data Quality Questions [(IES DOWNSTREAM LLC - KAPOLEI TERMINAL) (TRIFID: 96707CHVRN91480)] Form R for Reporting Year(s) 2019 and 2020 - Due April 29, 2022

Hi Gail,

The e-manifest number in question is 009835919, shipped to Burlington Environmental, LLC Tacoma Plant (RCRA ID WAD020257945). Hope this helps!

Abby Burton | **ERG (EPA Contractor)** | 908.251.7161 (mobile) | she/her/hers

### Facility Response – IC-3

**From:** Godenzi, Gail <[Gail.Godenzi@islandenergyservices.com](mailto:Gail.Godenzi@islandenergyservices.com)>

**Sent:** Thursday, April 28, 2022 11:24 PM

**To:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>

**Subject:** RE: [\*EXTERNAL\*] Toxics Release Inventory (TRI) Data Quality Questions [(IES DOWNSTREAM LLC - KAPOLEI TERMINAL) (TRIFID: 96707CHVRN91480)] Form R for Reporting Year(s) 2019 and 2020 - Due April 29, 2022

Abby,

For the PFAS question for RY2020– can you please clarify which e-manifest is in question? We do not have an e-manifest #1.

**From:** [abby.burton@erg.com](mailto:abby.burton@erg.com) <[abby.burton@erg.com](mailto:abby.burton@erg.com)>

**Sent:** Friday, March 25, 2022 5:57 AM

**To:** Godenzi, Gail <[Gail.Godenzi@islandenergyservices.com](mailto:Gail.Godenzi@islandenergyservices.com)>; [abby.burton@erg.com](mailto:abby.burton@erg.com)

**Subject:** [\*EXTERNAL\*] Toxics Release Inventory (TRI) Data Quality Questions [(IES DOWNSTREAM LLC - KAPOLEI TERMINAL) (TRIFID: 96707CHVRN91480)] Form R for Reporting Year(s) 2019 and 2020 - Due April 29, 2022

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(IES DOWNSTREAM LLC - KAPOLEI TERMINAL) (TRIFID: 96707CHVRN91480)] Form R for Reporting Year(s) 2019 and 2020 - Due April 29, 2022**

Fri Mar 25 11:54:43 EDT 2022

Dear GAIL GODENZI:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2019 and 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Cumene submitted to EPA from your facility: *IES DOWNSTREAM LLC - KAPOLEI TERMINAL* - (TRIFID: 96707CHVRN91480) for reporting year(s) 2019 and 2020 has been identified for follow-up due to the following:**

**Reporting Year 2019**

- For reporting year 2019, your facility might have reported for TRI listed chemical (CASRN: 98-82-8) as imported production volume in excess of TRI reportable threshold amounts to 2020 TSCA Chemical Data Reporting (CDR), but not reported for Cumene to TRI for reporting year 2019. Please review your calculations and submit new report for Cumene for reporting year 2019, if required.

**Reporting Year 2020**

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 1 hazardous waste shipments (some e-Manifest #s: 1) totaling 16,252 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=95b5acfb-595d-47d9-bee3-61ec95b84bc2&target=19da6a4f-c979-4eb5-9062-d7ce7021d194>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb).

<https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

**From:** [abby.burton@erg.com](mailto:abby.burton@erg.com) <[abby.burton@erg.com](mailto:abby.burton@erg.com)>

**Sent:** Friday, March 25, 2022 5:57 AM

**To:** Godenzi, Gail <[Gail.Godenzi@islandenergyservices.com](mailto:Gail.Godenzi@islandenergyservices.com)>; [abby.burton@erg.com](mailto:abby.burton@erg.com)

**Subject:** [\*EXTERNAL\*] Toxics Release Inventory (TRI) Data Quality Questions [(IES DOWNSTREAM LLC - KAPOLEI TERMINAL) (TRIFID: 96707CHVRN91480)] Form R for Reporting Year(s) 2019 and 2020 - Due April 29, 2022

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(IES DOWNSTREAM LLC - KAPOLEI TERMINAL) (TRIFID: 96707CHVRN91480)] Form R for Reporting Year(s) 2019 and 2020 - Due April 29, 2022**

Fri Mar 25 11:54:43 EDT 2022

Dear GAIL GODENZI:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2019 and 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Cumene submitted to EPA from your facility: *IES DOWNSTREAM LLC - KAPOLEI TERMINAL*) - (TRIFID: 96707CHVRN91480) for reporting year(s) 2019 and 2020 has been identified for follow-up due to the following:**

**Reporting Year 2019**

- For reporting year 2019, your facility might have reported for TRI listed chemical (CASRN: 98-82-8) as imported production volume in excess of TRI reportable threshold amounts to 2020 TSCA Chemical Data Reporting (CDR), but not reported for Cumene to TRI for reporting year 2019. Please review your calculations and submit new report for Cumene for reporting year 2019, if required.

**Reporting Year 2020**

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 1 hazardous waste shipments (some e-Manifest #: 1) totaling 16,252 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=95b5acfb-595d-47d9-bee3-61ec95b84bc2&target=19da6a4f-c979-4eb5-9062-d7ce7021d194>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare

(<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb).  
<https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

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If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

### **EPA Contractor Email – OG-6**

**From:** Abby Burton <Abby.Burton@erg.com>  
**Sent:** Tuesday, April 12, 2022 12:32 PM  
**To:** GAIL.GODENZI@ISLANDENERGYSERVICES.COM  
**Subject:** Reminder: Response Requested: TRI Data Quality Questions due April 29

Hello,

This is a reminder that EPA is requesting your response to the following Toxics Release Inventory data quality question(s). Even if you believe the data in question is correct and no changes are required, please fill out the survey linked below so this issue can be considered resolved.

Thank you for your cooperation.

Sincerely,

Abby Burton

**ERG (EPA Contractor) on behalf of** EPA Region 9

**From:** abby.burton@erg.com <abby.burton@erg.com>  
**Sent:** Friday, March 25, 2022 11:57 AM  
**To:** GAIL.GODENZI@ISLANDENERGYSERVICES.COM; Abby Burton <Abby.Burton@erg.com>

**Subject:** Toxics Release Inventory (TRI) Data Quality Questions [(IES DOWNSTREAM LLC - KAPOLEI TERMINAL) (TRIFID: 96707CHVRN91480)] Form R for Reporting Year(s) 2019 and 2020 - Due April 29, 2022

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Toxics Release Inventory (TRI) Data Quality Questions [(IES DOWNSTREAM LLC - KAPOLEI TERMINAL) (TRIFID: 96707CHVRN91480)] Form R for Reporting Year(s) 2019 and 2020 - Due April 29, 2022**

Fri Mar 25 11:54:43 EDT 2022

Dear GAIL GODENZI:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2019 and 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for Cumene submitted to EPA from your facility: *IES DOWNSTREAM LLC - KAPOLEI TERMINAL* - (TRIFID: 96707CHVRN91480) for reporting year(s) 2019 and 2020 has been identified for follow-up due to the following:**

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- For reporting year 2019, your facility might have reported for TRI listed chemical (CASRN: 98-82-8) as imported production volume in excess of TRI reportable threshold amounts to 2020 TSCA Chemical Data Reporting (CDR), but not reported for Cumene to TRI for reporting year 2019. Please review your calculations and submit new report for Cumene for reporting year 2019, if required.

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 1 hazardous waste shipments (some e-Manifest #: 1) totaling 16,252 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

*Step 1:*

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=95b5acfb-595d-47d9-bee3-61ec95b84bc2&target=19da6a4f-c979-4eb5-9062-d7ce7021d194>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

Step 2:

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Abigail Burton at [abby.burton@erg.com](mailto:abby.burton@erg.com).

Thank you for your attention to this matter.

Sincerely,

Abigail Burton

**From:** Godenzi, Gail <Gail.Godenzi@islandenergyservices.com>  
**Sent:** Tuesday, May 3, 2022 4:06 PM  
**To:** Abby Burton <Abby.Burton@erg.com>  
**Subject:** RE: [\*EXTERNAL\*] TRI Data Quality Issues Resolved [DO NOT REPLY]

Thanks Abby!

**From:** abby.burton@erg.com <abby.burton@erg.com>  
**Sent:** Tuesday, May 3, 2022 10:04 AM  
**To:** Godenzi, Gail <Gail.Godenzi@islandenergyservices.com>; abby.burton@erg.com  
**Subject:** [\*EXTERNAL\*] TRI Data Quality Issues Resolved [DO NOT REPLY]

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Region 9

Tue May 03 20:02:58 UTC 2022

Dear GAIL GODENZI:

EPA would like to inform you that data quality issues raised for your facility [IES DOWNSTREAM LLC - KAPOLEI TERMINAL (TRIFID: 96707CHVRN91480)] during reporting year 2019 and 2020 Adhoc Data Quality Checks are resolved for the following:

Reporting Year(s) Chemicals

2019 Cumene 2020 No chemicals

This data quality check for your facility has been completed.

Your cooperation is much appreciated.

Sincerely,

Abigail Burton

***ERG (EPA Contractor) on behalf of***

TRI Data Quality Program

US EPA

Region 9

**Facility Response – IC-4**

**From:** Godenzi, Gail <Gail.Godenzi@islandenergyservices.com>

**Sent:** Tuesday, May 3, 2022 4:08 PM

**To:** Abby Burton <Abby.Burton@erg.com>

**Subject:** RE: [\*EXTERNAL\*] Toxics Release Inventory (TRI) Data Quality Questions [(IES DOWNSTREAM LLC - KAPOLEI TERMINAL) (TRIFID: 96707CHVRN91480)] Form R for Reporting Year(s) 2019 and 2020 - Due April 29, 2022

Oh interesting and good to know. Glad this got resolved. Thanks!

**From:** Abby Burton <Abby.Burton@erg.com>

**Sent:** Tuesday, May 3, 2022 10:06 AM

**To:** Godenzi, Gail <Gail.Godenzi@islandenergyservices.com>

**Subject:** RE: [\*EXTERNAL\*] Toxics Release Inventory (TRI) Data Quality Questions [(IES DOWNSTREAM LLC - KAPOLEI TERMINAL) (TRIFID: 96707CHVRN91480)] Form R for Reporting Year(s) 2019 and 2020 - Due April 29, 2022

Hi Gail,

Attached see the e-manifest in question. Apparently the *e-manifest ID* I was looking at is assigned in the electronic system, so it's different than the *manifest tracking number* on the paper form.

Abby Burton | [ERG](#) | 908.251.7161 (mobile) | she/her/hers

### Facility Response – IC-5

**From:** Godenzi, Gail <[Gail.Godenzi@islandenergyservices.com](mailto:Gail.Godenzi@islandenergyservices.com)>

**Sent:** Tuesday, May 3, 2022 3:16 PM

**To:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>

**Subject:** RE: [\*EXTERNAL\*] Toxics Release Inventory (TRI) Data Quality Questions [(IES DOWNSTREAM LLC - KAPOLEI TERMINAL) (TRIFID: 96707CHVRN91480)] Form R for Reporting Year(s) 2019 and 2020 - Due April 29, 2022

We did not use any PFAS chemicals in 2020 so thanks!!

Hope you got my answer to the cumene question. The CDR report used the SDS quantity (high, but conservative), while the TRI report used the actual amount based on analytical data. This is why the quantities don't match.

**From:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>

**Sent:** Tuesday, May 3, 2022 9:11 AM

**To:** Godenzi, Gail <[Gail.Godenzi@islandenergyservices.com](mailto:Gail.Godenzi@islandenergyservices.com)>

**Subject:** RE: [\*EXTERNAL\*] Toxics Release Inventory (TRI) Data Quality Questions [(IES DOWNSTREAM LLC - KAPOLEI TERMINAL) (TRIFID: 96707CHVRN91480)] Form R for Reporting Year(s) 2019 and 2020 - Due April 29, 2022

Hi Gail,

I'm following up with EPA to try to figure out this manifest issue. I'm not a RCRA expert so I don't know what could cause any apparent mismatch.

In the meantime, if your facility didn't use any TRI-reportable PFAS chemicals in 2020, I can mark that down for the TRI data quality check.

Abby Burton | [ERG](#) | 908.251.7161 (mobile) | she/her/hers

### Facility Response – IC-6

**From:** Godenzi, Gail <[Gail.Godenzi@islandenergyservices.com](mailto:Gail.Godenzi@islandenergyservices.com)>

**Sent:** Tuesday, May 3, 2022 3:05 PM

**To:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>

**Subject:** RE: [\*EXTERNAL\*] Toxics Release Inventory (TRI) Data Quality Questions [(IES DOWNSTREAM LLC - KAPOLEI TERMINAL) (TRIFID: 96707CHVRN91480)] Form R for Reporting Year(s) 2019 and 2020 - Due April 29, 2022

Abby, I had our Admin people go thru every hard copy manifest on file, as well as all the electronic files for the last 5 years and we do not have a record of any Hazardous Waste Manifest 009835919. Perhaps the Generator accidentally used our RCRA ID number?? Or maybe our waste hauler??

**From:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>

**Sent:** Monday, May 2, 2022 8:23 AM

**To:** Godenzi, Gail <[Gail.Godenzi@islandenergyservices.com](mailto:Gail.Godenzi@islandenergyservices.com)>

**Subject:** RE: [\*EXTERNAL\*] Toxics Release Inventory (TRI) Data Quality Questions [(IES DOWNSTREAM LLC - KAPOLEI TERMINAL) (TRIFID: 96707CHVRN91480)] Form R for Reporting Year(s) 2019 and 2020 - Due April 29, 2022

That manifest is from RCRA ID HIT160010005 which EPA has associated with Island Energy's TRI facility ID. Can you confirm that RCRA ID is correctly associated with your facility? If so, I'll need to follow up with EPA headquarters to figure this out.

Abby Burton | **ERG (EPA Contractor)** | 908.251.7161 (mobile) | she/her/hers

## Facility Response – IC-7

**From:** Godenzi, Gail <[Gail.Godenzi@islandenergyservices.com](mailto:Gail.Godenzi@islandenergyservices.com)>

**Sent:** Monday, May 2, 2022 2:02 PM

**To:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>

**Subject:** RE: [\*EXTERNAL\*] Toxics Release Inventory (TRI) Data Quality Questions [(IES DOWNSTREAM LLC - KAPOLEI TERMINAL) (TRIFID: 96707CHVRN91480)] Form R for Reporting Year(s) 2019 and 2020 - Due April 29, 2022

Dear Abby, Can you double check this is for Island Energy Services?? I can not find a manifest with the number below. All our manifests stat with the numbers 006 (not 009). Would you happen to have a copy of the manifest?? We are very confused and want to resolve this ASAP.

Gail

**Gail Godenzi**

Technical Manager

[gail.godenzi@islandenergyservices.com](mailto:gail.godenzi@islandenergyservices.com)

IES Downstream, LLC

91-480 Malakole Street

Kapolei, HI 96707

Tel +1 808 682 3113

Mobile +1 808 352 7840





**From:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>

**Sent:** Friday, April 29, 2022 3:57 AM

**To:** Godenzi, Gail <[Gail.Godenzi@islandenergyservices.com](mailto:Gail.Godenzi@islandenergyservices.com)>

**Subject:** RE: [\*EXTERNAL\*] Toxics Release Inventory (TRI) Data Quality Questions [(IES DOWNSTREAM LLC - KAPOLEI TERMINAL) (TRIFID: 96707CHVRN91480)] Form R for Reporting Year(s) 2019 and 2020 - Due April 29, 2022

Hi Gail,

The e-manifest number in question is 009835919, shipped to Burlington Environmental, LLC Tacoma Plant (RCRA ID WAD020257945). Hope this helps!

Abby Burton | **ERG (EPA Contractor)** | 908.251.7161 (mobile) | she/her/hers

**From:** Godenzi, Gail <[Gail.Godenzi@islandenergyservices.com](mailto:Gail.Godenzi@islandenergyservices.com)>

**Sent:** Thursday, April 28, 2022 11:24 PM

**To:** Abby Burton <[Abby.Burton@erg.com](mailto:Abby.Burton@erg.com)>

**Subject:** RE: [\*EXTERNAL\*] Toxics Release Inventory (TRI) Data Quality Questions [(IES DOWNSTREAM LLC - KAPOLEI TERMINAL) (TRIFID: 96707CHVRN91480)] Form R for Reporting Year(s) 2019 and 2020 - Due April 29, 2022

Abby,

For the PFAS question for RY2020– can you please clarify which e-manifest is in question? We do not have an e-manifest #1.

**Email sent on 04/29/2022 03:21am**

**IES DOWNSTREAM LLC - KAPOLEI TERMINAL - 96707CHVRN91480 submitted a web response on Apr 29, 2022 3:20:55 AM. A PDF copy of the web response is attached.**

### **Facility Response – IC-8**

Subject: Facility Response Form

Apr 29, 2022 3:20:55 AM

From: Gail Godenzi

(808) 682- gail.godenzi@islandenergyservices.com  
3113

Contractor Company Name: IES Downstream, LLC  
(ex Chevron Refinery)

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

TRI-CDR-MIM RY 2019

- For reporting year 2019, your facility might have reported for TRI listed chemical (CASRN: 98-82-8) as imported production volume in excess of TRI reportable threshold amounts to 2020 TSCA Chemical Data Reporting (CDR), but not reported for Cumene to TRI for reporting year 2019. Please review your calculations and submit new report for Cumene for reporting year 2019, if required.

The source of these releases and quantities are listed below:

| Reported Chemical   | Response  | Reporting Year<br>(if applicable) |
|---------------------|---|-----------------------------------|
| Cumene              | No Change   |                                   |
| Reason for Response | TSCA CDR reporting in 2020 for base year 2019 was prepared using SDS data. For TRI reporting, sampling data was used. Sampling data indicated that cumene was not present in crude oils or refined products manufactured (via import), processed, or otherwise used at the facility in excess of 1% by weight. Per 40 CFR §372.38(a), "If a toxic chemical is present in a mixture of chemicals at a covered facility and the toxic chemical is in a concentration in the mixture which is below 1 percent of the mixture, or 0.1 percent of the mixture in the case of a toxic chemical which is a carcinogen as defined in 29 CFR 1910.1200(d)(4), a person is not required to consider the quantity of the toxic chemical present in such mixture when determining whether an applicable threshold has been met under §372.25 or determining the amount of release to be reported under §372.30." Therefore, cumene was correctly not reported under a Form R for reporting year 2019. |                                   |

PFAS-NOT-F RY 2020

The source of these releases and quantities are listed below:

| Response            | Reporting Year<br>(if applicable)                                       |
|---------------------|---|
| Other               |   |
| Reason for Response | Please clarify Manifest # in question. We do not have a "e-Manifest #1" |

.....

# INTEL CORP-RONLER ACRES CAMPUS (97124NTLCR2501N) 2501 NE CENTURY BLVD, HILLSBORO, OR 97124 (Region 10)

## EPA Email – OG-1

Region 10 Email

03/07/2022 12:50pm

From: *Brendan Whyte*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(INTEL CORP-RONLER ACRES CAMPUS) (TRIFID: 97124NTLCR2501N)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To              | E-Mail Address               |
|----------------------|------------------------------|
| Self: Brendan Whyte  | whyte.brendan@epa.gov        |
| To: SHANNON PHILLIPS | SHANNON.K.PHILLIPS@INTEL.COM |
| To: COURTNEY FISHER  | COURTNEY.FISHER@INTEL.COM    |

Attachments:

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

1200 Sixth Avenue SEATTLE, WA 98101

**Toxics Release Inventory (TRI) Data Quality Questions [(INTEL CORP-RONLER ACRES CAMPUS) (TRIFID: 97124NTLCR2501N)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Mon Mar 07 17:49:55 EST 2022

Dear SHANNON PHILLIPS and COURTNEY FISHER:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The Form R for NO\_VALUE submitted to EPA from your facility: INTEL CORP-RONLER ACRES CAMPUS) - (TRIFID: 97124NTLCR2501N) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS)

([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 22 hazardous waste shipments (some e-Manifest #s: 22) totaling 23,178 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=6c8fd551-12c5-4839-b2ee-4815a753f60d&target=b1f7bc24-ffc3-456a-8fb7-16cf40a7f2af>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is or have follow up questions, please contact Brendan Whyte at [whyte.brendan@epa.gov](mailto:whyte.brendan@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Brendan Whyte

**EPA Email – OG-2**

Region 10 Email

03/28/2022 03:43pm

From: *Brendan Whyte*

Subject: REMIDNER: Toxics Release Inventory (TRI) Data Quality Questions [(INTEL CORP-RONLER ACRES CAMPUS) (TRIFID: 97124NTLCR2501N)] Form R for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To              | E-Mail Address               |
|----------------------|------------------------------|
| Self: Brendan Whyte  | whyte.brendan@epa.gov        |
| To: SHANNON PHILLIPS | SHANNON.K.PHILLIPS@INTEL.COM |
| To: COURTNEY FISHER  | COURTNEY.FISHER@INTEL.COM    |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Sixth Avenue SEATTLE, WA 98101

**Toxics Release Inventory (TRI) Data Quality Questions [(INTEL CORP-RONLER ACRES CAMPUS) (TRIFID: 97124NTLCR2501N)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Mon Mar 28 19:43:16 UTC 2022

Dear SHANNON PHILLIPS and COURTNEY FISHER:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

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**The Form R for NO\_VALUE submitted to EPA from your facility: INTEL CORP-RONLER ACRES CAMPUS) - (TRIFID: 97124NTLCR2501N) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 22 hazardous waste shipments (some e-Manifest #s: 22) totaling 23,178 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

*Step 1:*

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=aad6203c-0c2e-41e7-bac5-7094c7ec2f0c&target=b1f7bc24-ffc3-456a-8fb7-16cf40a7f2af>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

*Step 2:*

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If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

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Thank you for your attention to this matter.

Sincerely,

Brendan Whyte

**Email sent on 03/07/2022 05:50pm**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Sixth Avenue SEATTLE, WA 98101

**Toxics Release Inventory (TRI) Data Quality Questions [(INTEL CORP-RONLER ACRES CAMPUS) (TRIFID: 97124NTLCR2501N)] Form R for Reporting Year(s) 2020 - Due April 29, 2022**

Mon Mar 07 17:49:55 EST 2022

Dear SHANNON PHILLIPS and COURTNEY FISHER:

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**The Form R for NO\_VALUE submitted to EPA from your facility: INTEL CORP-RONLER ACRES CAMPUS) - (TRIFID: 97124NTLCR2501N) for reporting year(s) 2020 has been identified for follow-up due to the following:**

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- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 22 hazardous waste shipments (some e-Manifest #s: 22) totaling 23,178 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

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*Step 1:*

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=6c8fd551-12c5-4839-b2ee-4815a753f60d&target=b1f7bc24-ffc3-456a-8fb7-16cf40a7f2af>

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Thank you for your attention to this matter.

Sincerely,

Brendan Whyte

**Facility Response – IC-1**

Subject: Facility Response Form

Apr 5, 2022 11:22:11 PM

From: Courtney Fisher

(971) 294-8815

courtney.fisher@intel.com

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

PFAS-NOT-F RY 2020

The source of these releases and quantities are listed below:

| Response            |  | Reporting Year<br>(if applicable) |
|---------------------|--|-----------------------------------|
| No Change           |  |                                   |
| Reason for Response | TRI threshold determinations for PFAS were reviewed and are correct for the Ronler Acres RY2020 TRI report. No CAS numbers listed in the RY2020 EPA TRI PFAS category were manufactured, processed, or otherwise used at Ronler Acres above the 100 pound reporting threshold. |                                   |

.....

**US DOD USAF JOINT BASE ELMENDORF-RICHARDSON TRAINING RANGES (99505SRMYF730QU)  
6326 ARCTIC WARRIOR DR, JBER, AK 99506 (Region 10)**

**EPA Email – OG-1**

Region 10 Email

03/07/2022 01:12pm

From: *Brendan Whyte*

Subject: Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF JOINT BASE ELMENDORF-RICHARDSON TRAINING RANGES) (TRIFID: 99505SRMYF730QU)] for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To             | E-Mail Address          |
|---------------------|-------------------------|
| Self: Brendan Whyte | whyte.brendan@epa.gov   |
| To: MARK PRIKSAT    | MARK.PRIKSAT@US.AF.MIL  |
| To: KAREN COULTER   | KAREN.COULTER@US.AF.MIL |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Sixth Avenue SEATTLE, WA 98101

**Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF JOINT BASE ELMENDORF-RICHARDSON TRAINING RANGES) (TRIFID: 99505SRMYF730QU)] for Reporting Year(s) 2020 - Due April 29, 2022**

Mon Mar 07 18:12:40 EST 2022

Dear MARK PRIKSAT and KAREN COULTER:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The for NO\_VALUE submitted to EPA from your facility: US DOD USAF JOINT BASE ELMENDORF-RICHARDSON TRAINING RANGES) - (TRIFID: 99505SRMYF730QU) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 1 hazardous waste shipments (some e-Manifest #: 1) totaling 10,657 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=eafd62d0-a871-4413-ba25-7547079f6513&target=60d164ce-e772-4007-8874-0b36dbed84bb>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise (<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms> [epa.gov]

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Thank you for your attention to this matter.

Sincerely,

Brendan Whyte

**EPA Email – OG-2**

Region 10 Email

03/28/2022 03:48pm

From: *Brendan Whyte*

Subject: REMINDER: Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF JOINT BASE ELMENDORF-RICHARDSON TRAINING RANGES) (TRIFID: 99505SRMYF730QU)] for Reporting Year(s) 2020 - Due April 29, 2022

| Sent To             | E-Mail Address          |
|---------------------|-------------------------|
| Self: Brendan Whyte | whyte.brendan@epa.gov   |
| To: MARK PRIEKST    | MARK.PRIEKST@US.AF.MIL  |
| To: KAREN COULTER   | KAREN.COULTER@US.AF.MIL |

Attachments:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Sixth Avenue SEATTLE, WA 98101

**Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF JOINT BASE ELMENDORF-RICHARDSON TRAINING RANGES) (TRIFID: 99505SRMYF730QU)] for Reporting Year(s) 2020 - Due April 29, 2022**

Mon Mar 28 19:48:11 UTC 2022

Dear MARK PRIEKST and KAREN COULTER:

This email message is a data quality check EPA is conducting in follow-up to your Toxics Release Inventory (TRI) report for reporting year(s) 2020. EPA performs many analyses on the TRI data prior to releasing the final report to the public to ensure that the TRI dataset is of the highest quality possible.

This inquiry does not assume that there is a reporting error. Rather, EPA would like to provide you an opportunity to review and validate your submission(s) regarding the below observation(s) and make correction(s), if necessary.

**The for NO\_VALUE submitted to EPA from your facility: US DOD USAF JOINT BASE ELMENDORF-RICHARDSON TRAINING RANGES) - (TRIFID: 99505SRMYF730QU) for reporting year(s) 2020 has been identified for follow-up due to the following:**

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report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=5b019a57-0c72-433a-a5bc-d81ba8895b84&target=60d164ce-e772-4007-8874-0b36dbed84bb>

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***Step 2:***

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Thank you for your attention to this matter.

Sincerely,

Brendan Whyte

**Email sent on 03/07/2022 06:12pm**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Sixth Avenue SEATTLE, WA 98101

**Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF JOINT BASE ELMENDORF-RICHARDSON TRAINING RANGES) (TRIFID: 99505SRMYF730QU)] for Reporting Year(s) 2020 - Due April 29, 2022**

Mon Mar 07 18:12:40 EST 2022

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**The for NO\_VALUE submitted to EPA from your facility: US DOD USAF JOINT BASE ELMENDORF-RICHARDSON TRAINING RANGES) - (TRIFID: 99505SRMYF730QU) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

- Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent approximately 1 hazardous waste shipments (some e-Manifest #: 1) totaling 10,657 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

*Step 1:*

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=eafd62d0-a871-4413-ba25-7547079f6513&target=60d164ce-e772-4007-8874-0b36dbed84bb>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

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Thank you for your attention to this matter.

Sincerely,

Brendan Whyte

### **EPA Email – OG-3**

**From:** [whyte.brendan@epa.gov](mailto:whyte.brendan@epa.gov) <[whyte.brendan@epa.gov](mailto:whyte.brendan@epa.gov)>

**Sent:** Monday, March 28, 2022 12:01 PM

**To:** [whyte.brendan@epa.gov](mailto:whyte.brendan@epa.gov); [KAREN.COULTER@US.AF.MIL](mailto:KAREN.COULTER@US.AF.MIL); PRIEKSAT, MARK A GS-14 USAF PACAF 673 CES/673 CES/CD <[mark.prieksat@us.af.mil](mailto:mark.prieksat@us.af.mil)>

**Subject:** [Non-DoD Source] REMINDER: Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF JOINT BASE ELMENDORF-RICHARDSON TRAINING RANGES) (TRIFID: 99505SRMYF730QU)] for Reporting Year(s) 2020 - Due April 29, 2022

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Sixth Avenue SEATTLE, WA 98101

**Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF JOINT BASE ELMENDORF-RICHARDSON TRAINING RANGES) (TRIFID: 99505SRMYF730QU)] for Reporting Year(s) 2020 - Due April 29, 2022**

Mon Mar 28 19:48:11 UTC 2022

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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Sixth Avenue SEATTLE, WA 98101

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Mon Mar 07 18:12:40 EST 2022

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Thank you for your attention to this matter.

Sincerely,

Brendan Whyte

#### EPA Email – OG-4

Region 10 Email

04/18/2022 03:49pm

From: *Brendan Whyte*

Subject: Questions for Your Facility [(US DOD USAF JOINT BASE ELMENDORF-RICHARDSON TRAINING RANGES) (TRIFID: 99505SRMYF730QU)] Regarding Toxics Release Inventory (TRI) Submissions - Due April 29, 2022

| Sent To             | E-Mail Address   |
|---------------------|--|
| Self: Brendan Whyte | <a href="mailto:whyte.brendan@epa.gov">whyte.brendan@epa.gov</a>     |
| To: MARK PRIEKSAT   | <a href="mailto:MARK.PRIEKSAT@US.AF.MIL">MARK.PRIEKSAT@US.AF.MIL</a> |
| To: KAREN COULTER   | <a href="mailto:KAREN.COULTER@US.AF.MIL">KAREN.COULTER@US.AF.MIL</a> |

Attachments:

**Questions for Your Facility [(US DOD USAF JOINT BASE ELMENDORF-RICHARDSON TRAINING RANGES) (TRIFID: 99505SRMYF730QU)] Regarding Toxics Release Inventory (TRI) Submissions - Due April 29, 2022**

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Thank you for your attention to this matter.

Sincerely,

Brendan Whyte

1200 Sixth Avenue SEATTLE, WA 98101

**Email sent on 03/28/2022 07:48pm**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Sixth Avenue SEATTLE, WA 98101

**Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF JOINT BASE ELMENDORF-RICHARDSON TRAINING RANGES) (TRIFID: 99505SRMYF730QU)] for Reporting Year(s) 2020 - Due April 29, 2022**

Mon Mar 28 19:48:11 UTC 2022

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Thank you for your attention to this matter.

Sincerely,

Brendan Whyte

Email sent on 03/07/2022 06:12pm

### Facility Response – IC-1

**From:** DYE-PORTO, JEANNE L GS-14 USAF PACAF 673 CES/CEI <[jeanne.dye-porto@us.af.mil](mailto:jeanne.dye-porto@us.af.mil)>

**Sent:** Monday, April 18, 2022 3:48 PM

**To:** Whyte, Brendan <[Whyte.Brendan@epa.gov](mailto:Whyte.Brendan@epa.gov)>

**Subject:** RE: [Non-DoD Source] Questions for Your Facility [(US DOD USAF JOINT BASE ELMENDORF-RICHARDSON TRAINING RANGES) (TRIFID: 99505SRMYF730QU)]

Regarding Toxics Release Inventory (TRI) Submissions - Due April 29, 2022

Brendan,

I am the new certifying official for Joint Base Elmendorf-Richardson (JBER), replacing Mark Prieksat in this role.

Also, request please remove Karen Coulter as a POC for JBER as she is no longer at this facility – or advise how do I remove her as POC for JBER.

I have registered for a CDX account for TRI-MEweb services to respond to this data quality data call and future TRI reporting.

V/r,

Jeanne

Jeanne Dye-Porto

Installation Management Flight Chief

673d Civil Engineer Squadron

Joint Base Elmendorf-Richardson, Alaska

DSN 317-384-3003 Comm 907-384-3003

**From:** PRIEKSAT, MARK A GS-14 USAF PACAF 673 CES/673 CES/CD <[mark.prieksat@us.af.mil](mailto:mark.prieksat@us.af.mil)>

**Sent:** Monday, April 18, 2022 1:33 PM

**To:** DYE-PORTO, JEANNE L GS-14 USAF PACAF 673 CES/CEI <[jeanne.dye-porto@us.af.mil](mailto:jeanne.dye-porto@us.af.mil)>

**Subject:** FW: [Non-DoD Source] Questions for Your Facility [(US DOD USAF JOINT BASE ELMENDORF-RICHARDSON TRAINING RANGES) (TRIFID: 99505SRMYF730QU)]

Regarding Toxics Release Inventory (TRI) Submissions - Due April 29, 2022

Jeanne,

See email below and please take Karen Coulter off the reporting. Thanks.

Mark

## EPA Email – OG-5

**From:** [whyte.brendan@epa.gov](mailto:whyte.brendan@epa.gov) <[whyte.brendan@epa.gov](mailto:whyte.brendan@epa.gov)>

**Sent:** Monday, April 18, 2022 11:51 AM

**To:** [whyte.brendan@epa.gov](mailto:whyte.brendan@epa.gov); [KAREN.COULTER@US.AF.MIL](mailto:KAREN.COULTER@US.AF.MIL); PRIEKSAT, MARK A GS-14 USAF PACAF 673 CES/673 CES/CD <[mark.prieksat@us.af.mil](mailto:mark.prieksat@us.af.mil)>

**Subject:** [Non-DoD Source] Questions for Your Facility [(US DOD USAF JOINT BASE ELMENDORF-RICHARDSON TRAINING RANGES) (TRIFID: 99505SRMYF730QU)]

Regarding Toxics Release Inventory (TRI) Submissions - Due April 29, 2022

**Questions for Your Facility [(US DOD USAF JOINT BASE ELMENDORF-RICHARDSON TRAINING RANGES) (TRIFID: 99505SRMYF730QU)] Regarding Toxics**

**Release Inventory (TRI) Submissions - Due April 29, 2022**

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Thank you for your attention to this matter.

Sincerely,

Brendan Whyte

1200 Sixth Avenue SEATTLE, WA 98101

**Email sent on 03/28/2022 07:48pm**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Sixth Avenue SEATTLE, WA 98101

**Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF JOINT BASE ELMENDORF-RICHARDSON TRAINING RANGES) (TRIFID: 99505SRMYF730QU)] for Reporting Year(s) 2020 - Due April 29, 2022**

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Thank you for your attention to this matter.

Sincerely,

Brendan Whyte

**Email sent on 03/07/2022 06:12pm**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

1200 Sixth Avenue SEATTLE, WA 98101

**Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF JOINT BASE ELMENDORF-RICHARDSON TRAINING RANGES) (TRIFID:**

**99505SRMYF730QU)] for Reporting Year(s) 2020 - Due April 29, 2022**

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regarding the below observation(s) and make correction(s), if necessary.

**The for NO\_VALUE submitted to EPA from your facility: US DOD USAF JOINT BASE ELMENDORF-RICHARDSON TRAINING RANGES) - (TRIFID:**

**99505SRMYF730QU) for reporting year(s) 2020 has been identified for follow-up due to the following:**

Reporting Year 2020

Section 7321 of the National Defense Authorization Act for Fiscal Year 2020 (NDAA) immediately added approximately 172 per- and polyfluoroalkyl

substances (PFAS) ([https://www.epa.gov/sites/production/files/2021-01/documents/tri\\_non-cbi\\_pfas\\_list\\_1\\_8\\_2021\\_final.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/tri_non-cbi_pfas_list_1_8_2021_final.pdf)) to the list of chemicals

covered by the Toxics Release Inventory (TRI), and the threshold for each chemical is 100 pounds per year. Your facility appears to have sent

approximately 1 hazardous waste shipments (some e-Manifest #s: 1) totaling 10,657 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF,

GENX or GEN-Xm, but your facility has not submitted any report for TRI-listed PFAS chemicals to TRI for reporting year 2020. Please review and

submit new report for appropriate TRI-listed PFAS chemical for reporting year 2020, if required.

***How do I respond to this inquiry? (Step 1 is always required)***

***Step 1:***

Begin by answering the questions on the following questionnaire:

<https://trimewebmod.epa.gov/cdx-tri-quest/questionnaire?survey=eafd62d0-a871-4413-ba25-7547079f6513&target=60d164ce-e772-4007-8874-0b36dbed84bb>

***If you indicate new submission, revision, or withdrawal in web response questionnaire, please proceed to step 2.***

***Step 2:***

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on

paper). EPA provides online tutorials on how to setup, prepare (<https://www3.epa.gov/tri/tutorials/TRIT-20/index.html>), revise

(<https://www3.epa.gov/tri/tutorials/TRIT-32/index.html>), withdraw (<https://www3.epa.gov/tri/tutorials/TRIT-33/index.html>), transmit, and certify a TRI

reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the

CDX login page (CDX is used to access TRI-MEweb). <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms>

[epa.gov]

If you need to make revisions, withdrawals, or new submissions, **please complete them and Certify them in your CDX reporting account by April 29, 2022..**

Please do not reply directly to this email. **This email account is NOT MONITORED.** Email replies cannot be read and will not receive a response.

If you are no longer the technical contact for TRI reporting, please forward this email to the new contact. If you do not know who the new technical contact is

or have follow up questions, please contact Brendan Whyte at [whyte.brendan@epa.gov](mailto:whyte.brendan@epa.gov).

Thank you for your attention to this matter.

Sincerely,

Brendan Whyte

### Facility Response – IC-2

**From:** KEARNS, AMY E GS-12 USAF PACAF 673 CES/CEIEC <[amy.kearns.1@us.af.mil](mailto:amy.kearns.1@us.af.mil)>

**Sent:** Wednesday, April 6, 2022 11:43 AM

**To:** Whyte, Brendan <[Whyte.Brendan@epa.gov](mailto:Whyte.Brendan@epa.gov)>

**Cc:** LANG, JAMES G GS-13 USAF PACAF 673 CES/CEIEC <[james.lang.6@us.af.mil](mailto:james.lang.6@us.af.mil)>; CIERLITSKY, MATTHEW A GS-12 USAF PACAF 673 CES/CEIEC <[matthew.cierlitsky@us.af.mil](mailto:matthew.cierlitsky@us.af.mil)>; KOPINSKI, BENJAMIN J GS-12 USAF PACAF 673 CES/CEIEC <[benjamin.kopinski@us.af.mil](mailto:benjamin.kopinski@us.af.mil)>

**Subject:** Toxics Release Inventory (TRI) Data Quality Questions [(US DOD USAF JOINT BASE ELMENDORF-RICHARDSON TRAINING RANGES) (TRIFID: 99505SRMYF730QU)]

Brendan,

I am working on preparing the response to the TRI Data Quality Question JBER received from you on 28 March 2022. I left a message on your phone 30 March 2022 and am following up with an email.

The data quality questions email from you references US DOD USAF JOINT BASE ELMENDORFRICHARDSON TRAINING RANGES (TRIFID: 99505SRMYF730QU) facility; however, this is not the TRIFID under which JBER submitted their RY20 TRI reports.

JBER reported under the US AIR FORCE JOINT BASE ELMENDORF-RICHARDSON (TRI ID 99506SDDSF11530) facility for RY20, which is a multi-establishment facility that includes the main installation and the training ranges.

Can you please email additional details regarding the records reviewed for US DOD USAF JOINT BASE ELMENDORF-RICHARDSON TRAINING RANGES (TRIFID: 99505SRMYF730QU) facility to ensure JBER provides the most accurate response and that JBER is looking at the same records as EPA. JBER does not have a manifest totaling 10,657 pounds listed containing PFAS, PFOA, PFOS, PERFL, AFFF, GENX or GEN-Xm, but JBER does have a manifest for 1,278 gallons of water with 3% AFFF (Manifest ID 004899398 FLE) dated 16 Apr 2020, that could equal 10,657 pounds depending on the liquid weight in lb/gal used.

V/R,

**AMY E. KEARNS**

JBER Air Quality Program Manager

724 Quarter Master Rd, Ste 213

JBER, AK 99504

[amy.kearns.1@us.af.mil](mailto:amy.kearns.1@us.af.mil)

Office (907) 384-1361 /Cell (907) 315-4768

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### Facility Response – IC-3

Subject: Facility Response Form

From: Amy Kearns

Contractor Company Name: 673 CES/CEIEC

Apr 20, 2022 11:53:08 PM

(907) 384-1361 [amy.kearns.1@us.af.mil](mailto:amy.kearns.1@us.af.mil)

You are receiving this form because EPA has detected some potential data quality issues with your facility's TRI submissions. The reporting year, chemical name, and an explanation of the potential error has been provided.

PFAS-NOT-F RY 2020

The source of these releases and quantities are listed below:

| Response            | Reporting Year<br>(if applicable)  |
|---------------------|--|
| No Change           |  |
| Reason for Response | JBER shipped the waste generated from the February 2020 AFFF spill in three separate shipments during reporting year 2020 including the one referenced in the data quality email. The waste streams were sampled and analyzed for individual PFOA/PFAS chemicals. Based on these lab results associated with each waste shipment, none of the individual PFOA/PFAS chemicals exceeded the 100 pound reporting threshold. Note: JBER submits its TRI data, including RY20, US AIR FORCE JOINT BASE ELMENDORF-RICHARDSON (TRI ID 99506SDDSF11530) not the one listed in facility response data quality email sent 28 March 2022. |

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